

14 Templesheen Road
West Sussex
PO22 6JB

3rd August 2020

Dear Sirs,

Re: WSCC/036/20: Ford Energy Recovery Facility

I wish to object to the proposed application on the following grounds:

Ford Neighbourhood Development Plan (FNDP)

The adopted FNDP has been created following more than five years of consultation with local residents. The Parish did not have a housing allocation but chose to develop a masterplan for the site to stop the spread of unsuitable developments in this rural area. It provides for a cohesive masterplan to deliver 1500 dwellings and community facilities. The proposal will be in breach of policies:

Policy SA1 Ford Airfield
Policy EH2 Renewable Energy
Policy EE10 Quality of commercial buildings
Policy SP1 Spatial Plan for the Parish

Furthermore there is a threat to the ability of Arun DC to maintain its five year housing land supply. It seems unlikely given the size, scale, pollution and health risks that the development could proceed.

Design and Visual Appearance

The size of this proposal will impact significantly on landscape and views. The Design and Access Statement makes it clear that "due to the scale and the setting of the site it will be impossible for the proposed development to be 'hidden', and that while it would be important for it to be designed in such a way as to best mitigate its visual impact, it would nevertheless be a large building and as such it should make a positive and confident architectural statement, one which celebrates its presence whilst at the same time giving due consideration to its surroundings and context". There is nothing other than a reference to the design reflecting the heritage of the site by resembling the wings of an aircraft that does anything to mitigate the huge size and dominance of the structure.

The chimney is shown in the few images as blending into the background which is misleading. The chimney will be clearly visible from all directions and will be emitting smoke/steam so will be very visual.

The Design and Access Statement states that "The site access and internal access roads will be illuminated during the hours of darkness to permit night time working (mainly during the winter period) as the ERF is operational for 24 hours per day." This combined with the fact that the chimney top will need to be lit will make the whole site visible from all points in the surrounding area. SDNP - H1.11 Policy LAND M1 (Protection of Landscape Character) states that Development within the setting of the South Downs National Park must have special regard to the conservation of that setting, including views into and out of the Park, and will not be permitted where there would be harmful effects on these considerations." The land is very flat so a building of this scale will be seen easily from the South Downs National Park.

Traffic, Noise and Air Quality

The Design and Access Statement makes very little comment about the state of the feeder road that leads to the newly created access to the site. The road is narrow, bordered in places by high verges and accessed by a roundabout from the A259 which is very small and which large lorries have difficulty negotiating. The impact of the noise and fumes on the houses, businesses and the prison have not been adequately assessed. The 240 movements a day will be added to by staff traffic (there are 67 parking spaces on the site) and there is to be a visitor centre allowing coaches and members of the public to visit the site which will add further traffic. This combined with the traffic generated by 1500 new homes will bring an unacceptable burden on the local roads.

The Design and Access Statement states "Odour will also be controlled by keeping the entry and exit door to the tipping hall closed when there are no waste deliveries occurring." There is a current issue with smell from the waste recycling plant which occurs when staff open the doors because the weather is hot. Unless the controls are rigorously applied this will be an issue.

The prevailing wind for the area is from the south-west (West Sussex Life 2014 p 118, pub. West Sussex County Council). This will bring gaseous discharges towards Arundel and the South Downs National Park.

The developer provides a report with predicted air quality impacts.

- In some places the report lists a number of different Receptors at which impacts are predicted. We note that even Walberton Parish (Receptor 24) is predicted to receive an amount of pollution from the site.
- Heavy metal pollutants are only considered at 'the point of maximum impact' with reference to an Air Quality Assessment Level (AQAL). It is highly desirable to know the level of toxic metals predicted at the various sites rather than just the point of maximum impact.
- The document states that comparison is made to an unidentified 'currently permitted facility'. We are concerned that this vague reference means that

comparison may not be taking place with a state-of-the-art plant built to the latest exacting emissions standards and could be another substandard but still operating plant chosen to improve the figures presented.

- Given the variable quality and nature of the fuel used (as household waste is of variable type), exact prediction of the issues is challenging and in the worst case scenario may be underestimated.

If the proposal is to be approved then the full benefits of a district heating system should be applied to all homes in the parishes of Ford, Climping and Yapton including all new homes to be built in the future.

Yours faithfully

A solid black rectangular box used to redact the signature of Maureen Chaffe.

Maureen Chaffe