

# WSSC PLANNING REFERENCE - WSSC/036/20

Ford Circular Technology Park, Ford Road, Ford, Arundel BN18 0XL

**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**

## **Introduction**

Yapton Parish Council (YPC) has fully considered the above application. Whilst acknowledging that the location, the Ford Circular Technology Park formerly known as the land of the former Ford Blockworks, is identified in West Sussex Waste Local Plan 2014 (WSWLP 2014) for such a use and has a live approved planning consent, WSSC/096/13/F, for a waste treatment facility (granted 2015) Yapton Parish Council (YPC) strongly object the above application.

Firstly, YPC would like to raise its deepest concerns with regard of the timing of this application which in its view give rise to substantial regional controversy and believe that the consultation period should be substantially extended. There are significant concerns across Ford, Yapton, Climping and the wider Arun district that there has been only limited community engagement given the potential impacts of the proposal. Also as a result of the application being submitted during the Covid-19 lockdown there has been little wider community awareness of the proposal until very recently.

It should also be noted that the applicant has continually referred those engaged to their Lakeside Facility as a comparison. It is not. Lakeside is a substantially lower building with a curvilinear roofline and its location is bounded by the M25, M4 and Heathrow runway; a very different setting to Ford's semi-rural location and B class road network.

## **Planning**

YPC believes that the proposal may conflict with national policies on several important matters. Namely, protecting the valued landscapes of the South Downs National Park and AONB, which are given the highest protection in the NPPF and potentially hindering the delivery of homes across Arun District Council.

YPC strongly believe that this application is in contradiction to the NPPF 2019 para 11.

***a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*** (NPPF 2019 para 11)

The application states that the new scheme will support a capacity of 295,000tpa of waste material, 45,000tpa in excess of that allocated with the WSWLP 2014 Policy W10(c) and 75,000tpa in excess of that which is consented.

The proposal places insufficient weight on Arun District Council's ALP 2018 Housing Delivery Policies and ignores the Ford Neighbourhood Plan 2017-2031 Housing Policy. Both Plans designate the surrounding land to the applicant's site for Strategic Housing - Site SD8

(Ford Airfield) accommodating up to 1,500 homes. Both the ALP and FNP recognise the applicant's site as a strategic waste location for capacity of up to 250,000tpa. Indeed, the applicant's site received consent in 2015, prior to both strategic documents being adopted and made respectively, for up to 220,000tpa waste capacity in a building half the height and substantially smaller in terms of mass and land coverage (WSSC/096/13/F). The proposed scheme's design and size fails to consider the ALP and FNP housing policies and places a significantly adverse effect on the deliverability of Ford Airfield housing site, SD8.

YPC strongly believe that **the local need for housing far outweighs the need to recycle an additional 45,000tpa** in a substantially higher and larger building that will also have a significant impact on both the character of the area and its landscape. YPC question whether the local and District need for housing should be wholly compromised when consent already exists for a similar facility but in a significantly smaller building that is compatible and blends in with housing, the overall area and the character and landscape of the Arun Coastal Plain and South Downs National Park.

YPC is of the view that the applicant's proposal contradicts **the West Sussex Waste Local Plan 2014 (revised 2019) Policy, W10(c)**. This states that the development of an allocated site must take place in accordance with the policies of the WSWLP and satisfactorily address the 'development principles' for that site identified in the supporting text.

The Ford allocation (Site north of Wastewater Treatment Works, Ford) states that it has the capacity to deliver up to c250,000tpa. The application states that it will exceed this allocation by 45,000tpa. A significant departure from West Sussex's own Waste Policy and the current planning consent WSSC/096/13/F.

**West Sussex Waste Local Plan 2014 (WSWLP 2014) Policy W11** clearly states that whilst a site may be designated for a waste facility it will only be permitted if it proves not to have ***'unacceptable impact on the character, distinctiveness, and sense of place of the different character areas of the County and that they reflect and, where possible, reinforce the character of the main natural character areas.'*** (WSWLP 2014 Policy W11)

Clearly the size and massing of the new proposal is a significant departure from the main natural character of the area with the existing industrial units being no higher than 12m. Moreover the current consented scheme is for a building with a roofline extending to 22m at its highest point and a dual chimney stack of 50m whereas the new proposal is for a unit with a roofline extending to 52m high covering an area of 4 football pitches and with a stack of 84m. The proposed unit will be the same size and massing of Tate Modern or Battersea Power Station. In a more local context the unit will be 10m higher than Kingsmere House (tallest block of flats in Littlehampton) and 7 times Kingsmere's footprint making it substantially larger in land coverage terms. The proposal will dominate the skyline and become the new definition of Arun's coastal plain, Littlehampton and surrounding towns and villages.

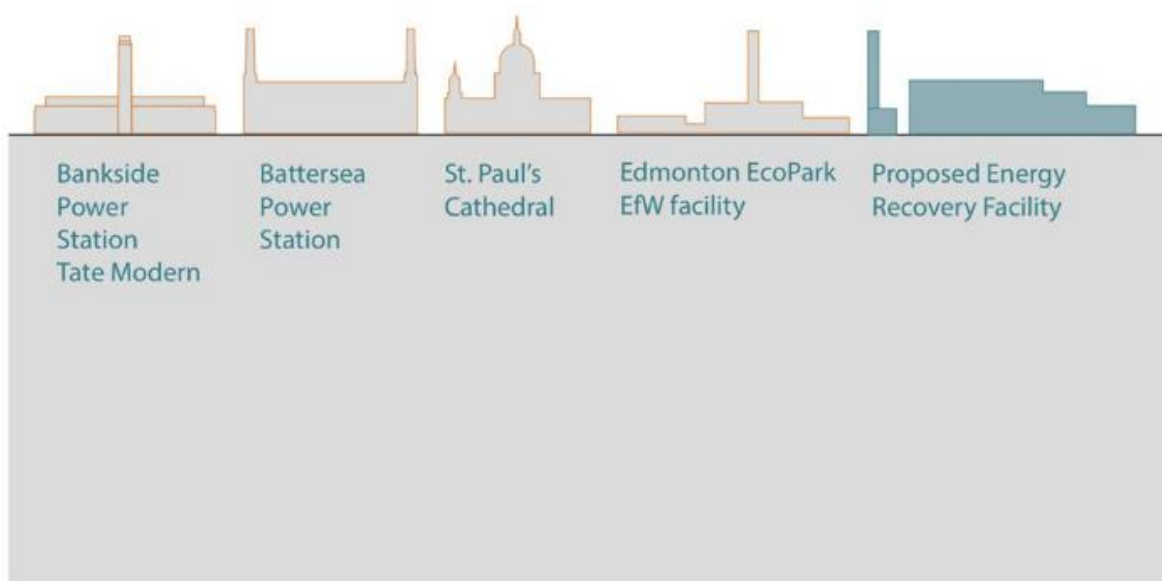


Figure 6.32: Comparison of ERF scale with some London landmarks

(NB Proposed Edmonton ERF is of comparable height and size to Ford)

The proposed building will be a highly visible and dominant, being the tallest landmark along the whole of the South Coast, visible from the sea and South Downs. It will have an impact on both the character of the Arun's Coastal Plain area and the views from of the South Downs National Park, Arundel town and Castle. The height of the stack is such that it will be visible on the horizon up to 20 miles away. Portsmouth is approximately 20 miles to the west and Brighton is approximately 20 miles to the east.

The need for a facility that does not cause harm to the landscape is further reiterated by **WSWLP 2014 Policy W12** which seeks to ensure that proposals for waste development are of a high quality and, where appropriate, the scale, form and design (including landscaping) take into account a number of identified matters. They include the need to integrate with adjoining land-uses and have regard to local context including: the character of different parts of West Sussex; the topography, landscape and skyline of the surrounding area; views into and out of the site; and, the use of materials and building styles.

The new proposal is in general block form standing at a continuous height of 52m with 84m chimney stack whereas the consented unit stands at 22m height with a dual chimney stack at 50m. The applicant's proposal has more than doubled in height and increased in volume by 115%. The proposal will be overbearing and substantially change the sense of place and nature of the location from light industrial use (most buildings being no more than 12m in height) to heavy industrial use, one which is perceived as incompatible with housing. This proposal has the very strong potential to blight the future use of the surrounding land for a generation depriving Arun District of much needed Strategic Housing land for up to 1,500 homes, a direct conflict with Government Policy.

The size and massing of the unit does not blend into the surrounding area. Furthermore, it is located in an area that Arun District Council's Landscape Capacity Assessment of Strategic

Sites February 2017 states to have ‘**substantial landscape sensitivity and moderate landscape value.**’ (Arun Landscape – Capacity Ford and Climping ref PESP5d). These classifications highlight how exposed the location is in visual terms as well as highlighting the lack of natural forms to help obscure and soften the significant impact this huge building will have on the surrounding landscape and key viewpoints.

YPC note that the applicant has placed considerable weight on its recent successful appeal decision concerning its replacement ERF at the Former Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD (Appeal Ref: APP/P3800/W/18/3218965). The Inspector makes clear that the size and mass of the proposed building in Horsham’s case was deemed acceptable as the closest sensitive landscape was 15km away and the building would be partially surrounded by undulating landscape and woodland reducing its impact on the surrounding landscape. The unit is also in a quarry with a curvilinear roof line being 36m at its highest point. The Ford proposal’s only similarity is in function and no more. The Ford proposal is located in a landscape of flat arable land with little natural screening to conceal the proposal’s 52m high building and substantial massing. It is also approximately only 2.30km south of the South Downs National Park and 2.85km south east of an Ancient Monument (Tortington Priory).

YPC believes that the proposal therefore raises significant architectural and urban design issues - given the significant scale of the proposal, the bulk of development is clearly out of character and impossible to screen. It will blight any housing proposals due to its close proximity and significantly adversely impact views from the South Downs National Park and that of an Ancient Monument.

On a more granular level the massing and height of the unit will dominate Yapton’s eastern boundary significantly lessening its rural character and sense of place. The operation of the facility will also greatly impact Yapton’s residents due to the 24 hour nature of the unit leading to significantly increased light pollution at night impacting both residents and the South Downs national park Dark skies policy. There will also be substantial noise pollution due to the proposed location of the designated external unprotected HGV stacking lane on the proposal’s western boundary which will blight any perposal for futures homes as designated in the ALP 2018.

YPC have deep concerns on the impact this proposal will have on the overall Community benefit along with whether it truly meets the social and economic benefits of the wider community of Arun District. ADC LP 2018 clearly designates the surrounding land for housing and accommodates the consented ERF of 22m height and capacity of 220,000tpa. The 1,500 proposed homes and consented ERF can sit side by side without significant detriment to either’s demands and requirements.

### **Need**

The proposed ERF at 52m height and larger massing has a significant and detrimental effect on the sustainability of the proposed 1,500 homes, placing ADC’s housing policy at risk. The question of Community need must be considered and which need is the greater – the need for 1,500 homes in a District with limited options for future housing growth or the need for a significantly larger building to house the applicant’s ERF plant. A plant that in the long term, will only generate 56 jobs?

West Sussex CC has identified several sites to fulfil its required waste capacity up until 2031 with Ford being identified for up to 230,000tpa. The current consented scheme has capacity of up to 200,000tpa, significantly diluting the need for a larger facility at Ford. This must be compared to ADC's shortfall in both housing supply and suitable available and developable alternative housing land to accommodate the potentially blighted 1,500 homes designated for the Ford Airfield Strategic Housing Site.

### **Conclusion**

YPC therefore object in the strongest form to this planning application. It is clearly incongruous with its setting and landscape, incompatible with the proposed 1,500 new homes on adjoining land, exceeds West Sussex's own waste capacity need for Ford and firmly ignores the overarching Community need and social benefit for housing growth.