

From: [REDACTED]
To: [PL Planning Applications](#)
Cc: [Jon Andersson](#)
Subject: WSCC/036/20
Date: 01 August 2020 13:29:15

Dear Sir/Madam.

Please see our comments and objections to the application WSCC/036/20. This is an ill-considered, environmentally polluting and visually horrendous proposed development.

With regard to the environmental aspects, the facility should not be considered unless it is equivalent to the best technology available anywhere in the World. This means:

1. Requirement for mandatory best available technology (BAT) for the incinerator and its emissions control systems This should be validated by a recognised technical expert in the field. Requirements would be:
 - a. Maximum waste to energy efficiency (in other words it should do the best job possible and not be a tick-box exercise for WSCC and prioritising a profit opportunity for Grundon and Viridor)
 - b. No secondary emissions to be allowed from the site above current background levels* (this is full control of regulated emissions and demonstration of no increase in secondary emissions). This would be based upon an independent detailed survey of current background levels, and a literature review etc on performance of suitable waste-to-energy and emissions control technologies, and their primary and secondary emissions.
 - Many emissions species have no safe limits for exposure, and the effectiveness of any candidate systems for reducing emissions should address all potential species. These would include, but not be limited to, nitrogenous species, sulphurous species, hydrocarbons, polyaromatics, volatile and non-volatile particles by number and by mass, metals and metal compounds of all types
2. No storage of ash/clinker on the site where wind and water could lead to contamination of surrounding areas
3. No storage of any flammable materials in such a manner as to present any risk of fire.
4. No storage of odorous organic materials except in hermetically sealed units. Plagues of seagulls already frequent the site, where Grundon has allowed stinking organic waste to be exposed to the air, attracting them.
5. Viability of the site should be predicated on the availability of sufficient quantities of high calorific value waste, thus limiting the number of truck movements. This must be sustainable for the lifetime of the facility. Currently available low calorific-value waste will require both more trucks and for those trucks to be coming from further afield, certainly beyond the boundaries of West Sussex. This facility is supposed to be part of a WSCC waste management strategy, not an excuse for polluting the environment indirectly.
 - a. It is not reasonable, or acceptable, to increase allowable truck movements to offset the unavailability of high calorific value fuel to be burned, as this results in increments of both greenhouse gases and pollutants from other sources.
 - b. No truck should be allowed to visit the site from outside the borders of West Sussex. Nor staged deliveries (i.e. dropping waste from outside Sussex inside the

county boundary) and then delivering it to site. A truck fleet driving millions of miles in the lifetime of the site to bring low calorific waste to Ford will generate huge quantities of unnecessary CO₂ emissions and pollutants.

- c. Increasing truck movements will have a huge impact on the peace and quiet, air quality, mobility due to road congestion and road safety in the area around the site. The roads will be further damaged by additional heavy-duty vehicles.
- d. CO₂ emissions are a global issue, leading to global warming, and the CO₂ from the preparation of materials for shipping and combustion, delivery to site, and operation of the site should be added to the county's carbon budget and properly justified.
 - i. A comprehensive environmental audit of the site should be undertaken, and a net environmental benefit proven
 - ii. There should be a plan for the total CO₂ output from the site to be offset by tree-planting or otherwise captured and nullified. Other greenhouse agents such as methane, nitrous oxide and black carbon should also be quantified and accounted, and draconian fines levied if the site is not wholly carbon-neutral.
 - iii. Pollutants will impact the health of local residents. All trucks that service the site, Grundon, Viridor, and sub-contractors, must be equipped with best available technology particulate and NO_x emissions control devices, so of Euro VI-D or E standard, to limit emissions under the duty cycles encountered on and immediately around the site. All light-duty vehicles should be Euro 6d-temp or later standards, alternatively PHEV or full electric vehicles, of an equivalent standard.

With regard to despoiling of the beauty of the south coast, views from South Downs and damage to the views from the Arun river and Climping gap:

6. The planned height of the building and chimney stack will cause extensive damage to local views including those both to and from the National Park. No high-rise dwellings have been approved in the area in several decades, so this building would set an extreme precedent.
7. There is also a high risk of a large visible plume, when weather conditions lead to water vapour condensation, which will lead to significant anxiety of local residents in the downwind area, as well as creating a terrible eyesore in the locality, and from the national park. This plume could be huge and visible for tens of miles.
8. The fallout from the stack will impact many densely populated areas to the east, and the consultation should be mandatorily extended to Littlehampton, Worthing etc who are downwind of the facility, given the prevailing westerly winds.

Please feel free to contact us for further information.

Best regards,

Jon and Heather Andersson
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