

County Planning
County Hall
Chichester
PO19 1RH

Our Ref: SDNP/20/02905/ADJAUT
Contact Officer: Kelly Porter
Tel. No.: 01730 819314

6th August 2020

Dear Sir/Madam,

Neighbouring Authority Consultation

Proposal: Adjoining Authority Consultation from West Sussex CC, Case Ref: WSCC/036/20 - 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.

Address: Ford Circular Technology Park, Ford Road, Ford, Arundel, West Sussex, BN18 0XL

Thank you for your correspondence received 8 July 2020, consulting us as a neighbouring authority on the above noted development proposals.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination. The statutory purposes and duty of the National Park are:

- **Purpose 1:** To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- **Purpose 2:** To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- **Duty:** To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

The National Park's comments on the development are as follows:

At the present time, we are objecting to the proposal given its impact on the Statutory Purposes of the South Downs National Park and its special qualities.

Please note our comments below are focused on the landscape and visual impacts of the proposal, we will leave it to West Sussex County Council to determine the acceptability of other potential impacts, such as air quality and impacts to public rights of way and highways.

We acknowledge that this site is allocated for such a use in the adopted Waste Local Plan and safeguarded in the adopted Arun Local Plan, we did not object to permission WSCC/096/13/F and the surrounding land is allocated as Strategic Housing Site in the adopted Arun Local Plan (and is currently subject to an application F/4/20/OUT to Arun District Council).

We do accept that any new development in this area will have an urbanising impact on the wider

landscape, however this application is proposing a substantially large building(s) and stack (with the building approximately 30m higher and the stack 35m higher than the permitted scheme).

We agree with the conclusions of the submitted Environmental Statement (and in particular the LVIA) that this proposal will have substantial adverse impacts on views and experiential qualities of the National Park and its setting. For example, the proposal will be highly visible in panoramic views of the Arun Valley / coastal plain from a National Trail (the South Downs Way) and other public rights of way across the National Park.

However, we do not agree with the conclusion that by creating a 'visually dynamic architectural landmark', that this impact is acceptable.

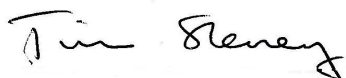
As stated, we accept that the neighbouring Strategic Housing Site will also have an impact on the National Park (particularly in the panoramic views of the Arun Valley / coastal plain), however, it is the combination of the scale, height, bulk (in particular) and colour choices (notably the 'coppery earth') of this proposal which is creating the unacceptable adverse impacts.

We do not believe that sufficient consideration has been given to all the mitigation measures to reduce the adverse impacts to the National Park and in harmonising this proposal with the landscape.

In addition to exploring further a reduction in scale and height of the building(s) and stack and other measures to reduce the visual impact. Further consideration should be given to the use of 'green / living' walls (which would have the added benefit of enhancing the biodiversity / ecology of the site). The use of living walls on such a facility is possible, as shown on facilities owned / managed by Veolia (the Recycling and Energy Recovery Facility in Leeds and the Materials Recovery Facility proposed in Alton, Hampshire).

We would also like to reiterate that under Section 62 of the Environment Act 1995, the need for West Sussex County Council to be confident that they have met the legal requirement to have regard to the National Park in determining this application and are able to clearly show how they have considered the Statutory Purposes of the National Park in their decision making.

Yours faithfully



TIM SLANEY
Director of Planning
South Downs National Park Authority

Contact Officer
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