

Comment for planning application WSCC/036/20

Application number	WSCC/036/20
Name	peter newman
Address	CHURCH FARM HOUSE, CHURCH ROAD, CHURCH ROAD, ARUNDEL, BN18 0EP
Type of Comment	Objection
Comments	

Firstly, this application will have a fundamental impact on Ford and the surrounding coastal area and there has been limited community engagement due to Covid restrictions. The applicant acknowledges some supporting material normally expected for such an application is missing due to the lockdown which is not acceptable for such a major application of this nature. I suggest the consultation period be extended a further 8 weeks to give people time to consider the proposal in more detail. I ask that the application be refused for the following reasons: - Need The planning consent granted in 2015 permits a facility that can deal with 220,000 tonnes of waste p.a - which is already a 10 fold increase in what the existing site currently processes. The new proposal is for an EfW facility that could handle up to 295,000 tonnes of waste p.a. This far exceeds the need requirement in respect to this site of 250,000 tonnes pa identified in the West Sussex Waste Local Plan 2014. It is noted that the applicants obtained a variation to the extant planning consent in 2016 "to allow the acceptance of recyclable material from outside West Sussex" which clearly indicates the smaller consented facility would need to take waste from other counties to reach its capacity. It follows that the larger proposed plant would accept an even greater volume of waste from neighbouring counties of Hampshire, East Sussex, and Surrey. Size & Massing of building The extant consent for the site permits the buildings up to 22m in height with a chimney up to 50m (which is already considerably higher than the existing 17m high "hanger" buildings currently on site). This application proposes a building height of almost 52m, a width of 134m and length of 170m The proposed building would be larger than Battersea Power Station or Tate Modern but standing in a relatively rural position and as the applicant acknowledges, with little or no ability to mitigate its influence. By comparison, this building would be c.10m taller and 7 times the width of Kingsmere House in Littlehampton. Visibility and Setting Not only would the incinerator stand taller than any other building in the area, the bulk of the building would overpower and dominate the landscape from all points of the compass for many miles. The applicant's own visual assessment accepts it would have a significant adverse moderate / moderate substantial effect on the surrounding landscape. This is a far greater detrimental impact than any of the assessments reached by the inspector in relation to the Horsham incinerator appeal. In that case, a smaller building was proposed with a maximum height of 36m and its impact was mitigated by its position being set at a lower level in a former quarry surrounded by higher ground densely covered by mature trees. By contrast, this proposal would stand in isolation on a large semi rural coastal plain with far reaching uninterrupted views. The landscape that would be detrimentally affected includes part of the South Downs National Park, approx. 2.2 km north of the site, the town of Arundel and Arundel Castle - a Grade 1 listed national monument, the nearby six villages and Littlehampton- an area which includes an established seaside resort, relies heavily upon tourism. A further important consideration is the night time visibility - whilst there would be a bund along most boundaries of up to 3m, the road system and outside parking washing area (particularly along the west elevation) will be floodlight by high level LED pixilated lighting. There will also be rooflights in the EfW building which operates 24 hours a day - so it would be reasonable to expect considerable light spill from the site throughout each night. The site sits on the northern edge of a small industrial estate adjacent to open fields that extend for miles all the way to the South Downs National Park. The night time glow would severely impact local residential - existing and proposed and would be clearly visible from the South Downs Nation Park. The upper lighting on the 85m chimney would also become an unwanted landmark that will light up the surrounding dark skies. Design and layout The scheme has been designed with the shorter elevation of 134m facing north and south to reduce the visual impact when viewed from Arundel and the coast. As a result, the longer 170m elevations facing east and west, face on to the immediate residential population of Yapton and Ford. The block design has little architectural merit and does nothing to mitigate the impact of this huge monolith on the local community. The proposed circular road system within the site takes most refuse along the Western boundary. The noise generated by these vehicles moving and reversing along this boundary will be clearly heard by the residents of Yapton and Ford and have a very detrimental effect on the proposed 1,500 homes allocated to be built on the adjacent site. Parking facilities for 28 HGV's show there will be constant reversing (beeping) and manoeuvring in this area and the vehicles are parked up and washed. I would hope this specific facility could be relocated into the middle of the site where the associated noise and light can be reduced. It is proposed that the incinerator will be working 24 hours a day, 7 days a week and I have concerns that the noise from the fans will be audible during the evening and throughout the night. This highlights why a plant of this size is not suitable in a location where there are many residents (current & proposed) in close proximity. HGV Movement The majority of the HGV's visiting the site will be external contractors and the route taken for access and egress from the site is purely on a trust basis. There is

little that can be done to stop independent HGV drivers taking a shorter route via Ford Lane or through Yapton village - the proposed monitoring process seems a toothless watchdog. Conclusion When all these factors are weighed against the benefits of the scheme, its contribution to the area would be overwhelmingly negative. In terms of policy, the application contravenes points W11 & W12 of the West Sussex Waste land Policy (WLP) as well as National Planning policy Guidance (PPG) relating to the setting of a National Park and should be refused.

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Attachments