

From: [Nicola Wilson](#)
To: [Nicola Wilson](#); [PL Planning Applications](#)
Subject: Application WSCC/036/20 - objection
Date: 07 August 2020 17:31:12

Dear County Planning Team,

Please find detailed herein my comments relating to planning application WSCC/036/20.

The application proposes some staggering changes to the previously approved application for the site. It changes the plant from a gasification plant to an incinerator yet unlawfully describes the plant as an energy recovery facility. It increases capacity and expands the types of waste to be handled to include commercial and industrial waste therefore increasing pollutants and particulates that would be released into the local area. It hugely expands the scale of the buildings. It increases the traffic, noise, and therefore disturbance to the local population and wildlife. The application is wholly unsuitable for the location in a number of ways. I object to this application and support all points made by Ford Parish Council.

R1 status

This determines where the plant resides with regards to the waste management hierarchy. **The Ford plant is not on the list of R1 applications as of 14th July 2020 - linked below.** The Environment Agency is the governing body for this accreditation and the applicant cannot supply calculations and award themselves R1 status. By law, under the Waste Framework Directive, without this accreditation the site cannot be considered a recovery facility, it is a waste disposal activity and it falls within the same tier as land fill in the waste management hierarchy.

I question the legality of the application where the application description uses the words "energy recovery facility". I cannot stress enough that the council need to uphold the law and Environment Agency regulations in this matter. It is, at best, misleading to allow this application to reach this stage with this wording.

A plant in this tier does nothing to progress the national objectives of reducing waste to landfill. The council has and should continue to consider R1 status as a condition of approval. It is of vital importance to current and future generations that we take decisions now that ensure the appropriate treatment of waste going forward. This plant is not a future proof solution and will create problems for the future local, national, and global populations and governments.

As the plant is now proposing to handle not just municipal waste but commercial and industrial, the applicants is stating their own intent to not comply with R1 status requirements which require the plant to be principally designed to process MSW (municipal solid waste).

<https://data.gov.uk/dataset/8287c81b-2288-4f14-9068-52bfda396402/r1-status-of-incinerators-in-england>

The application should be rejected on these grounds.

Building size and character of the area

The changes included in this application:

22m to 51m building

50m to 85m chimney

The scale of the proposed buildings would make them the largest and tallest building for many miles around. The area is flat, overlooked by the historic town of Arundel with Cathedral and Castle, and the South Downs National Park. There are grade II listed buildings within a few hundred metres of the site which would be completely

overwhelmed. Chichester cathedral is the only medieval cathedral visible from the sea and this application would allow a building to dwarf that historic beautiful landmark. There are recently completed, in progress, and upcoming residential developments surrounding this area. The waste management facility threatens the future developments and therefore the ability of the local authority to meet residential targets. The application should be rejected on these grounds.

Traffic

The application increases the HGV movements from 30 vehicles in and out each day to 120. The increase in waste capacity in the application is a much smaller percentage increase which calls into questions why so many vehicle movements are needed. Was the original application flawed? The roads in the area struggle with traffic flow and such an increase in HGV movement, coupled with the increased population from approved residential planning would significantly and negatively impact transport capability in the area. The application should be rejected on these grounds.

Pollutants and financial impact

Incinerators emit large quantities of CO₂, roughly one tonne of CO₂ for every tonne incinerated. About half of this CO₂ derives from fossil sources such as plastic. For decades incinerators have been releasing harmful greenhouse gas (GHG) emissions without compensating society for the associated harm that this has caused. In June 2011 Defra acknowledged (in their Economics of Waste and Waste Policy publication) that incinerators were “creating GHG emissions without paying the relevant price”. Unlike power stations, waste incinerators are not part of the Emissions Trading Scheme, and therefore the relevant BEIS carbon prices to use are those for non-traded carbon. The type of plant proposed will introduce harmful substances into the air we all breathe. As we consider the higher risk that pollution poses for a population facing a pandemic it would be irresponsible to allow an increase in pollutants.

The application should be rejected on these grounds.

Year	Waste incinerated	Fossil CO ₂ e per tonne of waste incinerated	Fossil CO ₂ e	Non-traded carbon price
2017	10,883,000 tonnes [a]	0.458 tonnes [b]	4,984,414 tonnes [c]	£66.25 [d]
2018	11,487,000 tonnes [f]	0.458 tonnes [b]	5,261,046 tonnes [c]	£67.25 [d]
2019	12,626,000 tonnes [g]	0.526 tonnes [g]	6,641,276 tonnes [c]	£68.25 [d]

Sources / calculations: [a] [2017 UK EfW Statistics \(Tolvik, June 2018\)](#), [b] [Evaluation of the climate change impacts of waste incineration in the United Kingdom \(UKWIN October 2018\)](#), [c] Tonnes of waste incinerated multiplied by tonnes of fossil CO₂ per tonne, [d] [Table 3: Carbon prices and sensitivities 2010-2100 for appraisal, £/tCO₂e from Data tables 1 to 19: supporting the toolkit and the guidance](#) (BEIS, March 2019), [e] Tonnes of fossil CO₂ multiplied by non-traded carbon price, [f] [2018 UK EfW Statistics](#) (Tolvik, June 2019) [g] [2019 UK EfW Statistics](#) (Tolvik, May 20120)

UK incineration capacity (December 2019)

As we get closer to achieving our recycling targets there is increasingly less 'residual' waste available to burn. It has been estimated that there could be around 10.4 million tonnes of residual waste available by 2030 but we currently have around 16.85 million tonnes of capacity ([Source](#)). As such, the UK already faces incineration overcapacity, with more incineration capacity than genuinely residual waste available to burn. Despite this, there are dozens of proposals for new incinerators in the UK which, if built, would exacerbate overcapacity and come at the expense of opportunities to improve recycling. These facts underpin calls for a moratorium on new waste incineration capacity in the UK. Introducing an incinerator into the area will reduce the emphasis on recycling and may result in the incineration of recyclable materials in efforts to keep the plant running cost effectively. The application should be rejected on these grounds.

Status	Number of Incinerators	Headline Incineration Capacity
Fully Operational	48 facilities	14.60 million tonnes
In Late Stage Commissioning	5 facilities	0.80 million tonnes
In Construction	12 facilities	3.10 million tonnes
Total	65 facilities	18.50 million tonnes

Source: [2019 EfW Statistics](#) (Tolvik, June 2020)

In response to supporters:

The letter of support for this application from Veronique Bensadou, Senior Planner at Grundon, states that "These proposals constitute a significant investment in state-of-the-art waste management facilities." In fact this application takes a substantial step back in the technology to be used compared to the previous application and is in no way future proof. The change from a gasification plant to an incinerator is a big step back. This correspondent and others discuss the plant "diverting waste away from landfill" however the lack of R1 status means this plant is on the same tier as landfill in the waste management hierarchy. The application should be rejected on these grounds.

Yours sincerely,

Dr Nicola Wilson

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