

## CLYMPING PARISH COUNCIL

**PLANNING APPLICATION WSCC/036/20** for an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes at Ford Circular Technology Park, Ford Road, Ford

### OBJECTION

Clymping Parish Council strongly objects to this application for the following reasons:

#### 1. **NEED – this is unproven!**

The recent approval on Appeal of the recycling, recovery and renewable energy facilities at Horsham, throws into question the need for this proposed expansion of incineration capacity at Ford completely. The new site at Horsham has the capacity to deal with 235,000 tonnes per annum (tpa) of incineration waste, additional to that defined within WSCC Waste Local Plan 2014 (WLP).

At the Horsham Appeal (APP/P3800/W/18/3218965) the Inspector accepted the WLP 2014 and the 2019 Review of WLP as providing a sound basis for judging the need for West Sussex waste treatment incineration capacity. The 2019 review confirmed that forecast demand was growing as anticipated for all categories of waste that might be treated by incineration and took account of that already approved at Ford WSCC/096/13/F (140,000 tpa).

The 2019 WLP review did **not** however anticipate the additional capacity now available via the approval of the Horsham incinerator and this has two obvious consequences:

- a) There can be no justification in West Sussex for expanding incinerator capacity at Ford over the approved 140,000 tpa, based on West Sussex need.
- b) The West Sussex WLP 2014 requirements for waste treatment are now out of date as a result of the Appeal judgement and therefore not relevant for judging future waste treatment requirements in West Sussex.

**WLP should therefore be subject to further review before any consideration of this application.**

#### 2. **LOCATION – it is in the wrong place!**

##### a) **Sustainability of Transport**

The location of an incinerator at Ford is poor by any measure of transport sustainability. It is too far south as a centre for West Sussex waste or for waste from neighbouring counties or the region.

All waste movements in and out of this location will be by road. This is contrary to WLP Strategic objective 7:

*“to maximise the use of rail and water transport for the movement of waste and to minimise lorry movements and the use of local roads for the movement of waste”*

and to the associated policy WP18.

It will spread congestion, noise and transport carbon emissions across the county on an already poor road infrastructure with a significant impact through Clymping village on the unclassified local road, Church Lane.

Furthermore, if demand for this additional capacity does not exist in West Sussex the operator has a commercial incentive to seek to import waste either regionally or nationally.

In the Parish Council objection to WSCC/009/16/F we pointed out that to extend the acceptance of recyclable material from areas outside of West Sussex raises serious sustainability issues. The site is simply not located appropriately to become a regional/national facility given its situation close to the coast, thereby losing half its catchment area. The site is at one of the furthest points from the major road system surrounding West Sussex being located at a southerly point, mid-way along the coast. This means waste would have to be transported through a large swathe of West Sussex using the inadequate road infrastructure.

The current consultations on the A27 Arundel bypass and the A259 Options Review underline the inadequacy of the east west coastal, trunk routes. It is simply not eco-friendly to encourage additional fuel usage, highway congestion and attendant pollution from the very largest HGVs that will be required to supply the proposed enlarged incinerator.

The new facility at Horsham is in a far better and more central location for the county with easy access to the motorway and A road dual carriageway networks. This should become the centre for incineration in West Sussex.

## **b) Sustainability of Operations**

From the perspective of sustainability, incineration is second to bottom in the hierarchy of waste handling processes, well below the waste minimisation or waste reuse and repurposing that should be the objective. We recognise some incineration will be needed but this is now available given the Horsham incinerator approval.

Incineration inevitably generates carbon emissions and compares very unfavourably to newer renewable energy generation options such as solar or wind power generation. Taken together with the transport points above, we feel this application fails completely in regard to the WLP Strategic Objective 14:

*“To minimise carbon emissions and to adapt to, and to mitigate the potential adverse impacts of, climate change.”*

## **c) Residential Proximity**

The location so close to existing residential dwellings and the 1500 proposed dwellings on the Ford strategic allocation in the Arun District Council Local Plan is contrary to WLP Policy W12 (a)

*“to integrate with and, where possible, enhance adjoining land-uses and minimise potential conflicts between land-uses and activities”*

It will clearly do none of these things. The two Local Plans are in obvious conflict. This represent a serious failure of spatial planning in the area.

Residents or future residents living close by will be dominated and overshadowed by buildings of the size proposed, destroying any sense of a valued place in the countryside, contrary to WLP Policy 11:

*“Proposals for waste development will be permitted provided that they would not have an unacceptable impact on (a) the character, distinctiveness, and sense of place of the different areas of the County and that they reflect and, where possible, reinforce the character of the main natural character areas (including the retention of important features or characteristics)”*

#### **d) Visual impact**

The proposed incinerator has twice the capacity but is physically many times larger than the incinerator envisaged under WSCC/096/13/F. This enormous building will have a seriously detrimental impact on both the immediate locality and the surrounding landscape from the South Downs National Park to the sea and as viewed from historic town of Arundel. This is contrary to National Planning Policy and the Waste Local Plan Policy W12 (b) that requires development to:

*“ have regard to the local context including:*

- (i) the varied traditions and character of the different parts of West Sussex;*
- (ii) the characteristics of the site in terms of topography, and natural and man-made features;*
- (iii) the topography, landscape, townscape, streetscape and skyline of the surrounding area;*
- (iv) views into and out of the site; and*
- (v) the use of materials and building styles.*

Given the proposed mass and height, it will be an alien building that will dominate all viewpoints. It is therefore also contrary to Clymping Neighbourhood Plan Policy CPN 7 *Protection of Open Views*.

### **3. TRAFFIC**

#### **a) During construction**

We note the application anticipates a five-year construction period with total site traffic (all vehicle types) creating up to 1164 daily movements. The majority of this is likely to be on Church Lane, Clymping where current daily movements are typically 8000 – 10,000 movements a day. The construction will involve the importation of large tonnages of engineering materials (metals and concrete) that will lead to further damage to the road surface.

Church Lane is a narrow and unclassified village road with no safe controlled crossing points for residents and a narrow pavement set too close to the edge of the carriageway for pedestrians to feel safe when walking so close to fast moving passing HGVs (the speed limit is 40 mph but regularly exceeded).

The increase in vehicular movements represents a material increase of well over 10% but no mitigation is proposed for the impact on other road users or local residents contrary to Clymping Neighbourhood Plan Policy CPN 14 *Traffic and the Environment*.

Taken together the traffic impacts are contrary to the provisions WLP Policy W18 c) due to the impact on the local road infrastructure and the safety implications for local residents. The policy only permits development where:

- (i) *materials are capable of being transported using the Lorry Route Network with minimal use of local roads, unless special justification can be shown;*
- (ii) *vehicle movements associated with the development will not have an unacceptable impact on the capacity of the highway network;*
- (iii) *there is safe and adequate means of access to the highway network and vehicle movements associated with the development will not have an adverse impact on the safety of all road users.*

No account appears to have been taken of the impact of the vehicle movements on local historic Grade I (St Mary's Church, Clymping) and Grade II buildings along Church Lane whose structure and use will be affected by HGV movements along degraded and pot holed road surfaces (noise and vibration). This is contrary to WLP Policy W15 designed to protect local heritage.

In fact, the credibility of the transport assessment is totally undermined by the reliance on a proposal in the Arun Local Plan that the limitations of the Church Lane A259 small roundabout can be effectively overcome by widening the westerly A259 entrance to the roundabout. As soon as this was looked at seriously it was clear that a completely new, larger roundabout and junction design is essential (see CM/1/17/OUT and the WSCC A259 Options Study). This negligent attention to detail and real local issues gives Council no confidence in the traffic and highways provisions of this application.

#### **b) When operational**

Much is made of the existing approval for vehicle movement including up to 240 HGVs daily (120 in, 120 out) WSCC/030/17/F. This approval was however given in a completely different context for the total movement of 200,000 tpa envisaged in the earlier incinerator application, granted to provide operational flexibility to the site. This application is for a 50% increase in total tonnage and the only conclusion is that there will on average far higher numbers of the very largest HGVs on the local roads, further damaging them. Again, Church Lane is an unclassified road in poor condition with very poor provision for pedestrians and cyclists.

The application includes the observation that operations may necessitate exceeding this HGV cap, so what sort of cap is it? Or is not a cap at all. This is simply unacceptable especially given that the operator of the facility is not the operator of all the HGVs wishing to deliver waste to the site when it suits them best.

## **4. RISK**

Of particular concern given its proximity to dwellings are a variety of perceived risks contrary to WLP Policy W19 *Public Health and Amenity*:

- a) **Fire risk**, especially given the recent spate of fires at local waste sites at Clymping (TJ Waste) and Chichester municipal waste tip. Residents are concerned about the risks from waste stored at the site or during operations.
- b) **Emissions**, where we fear there could be unacceptable impact:
- on public health due to chemicals emissions, including those arising from traffic as above. It is important that the most effective, proven technologies are deployed, and regular monitoring of the surrounding area put in place to reassure local communities.
  - On residential amenity due to 24-hour operational lighting; and noise, dust and odours generation during construction and operation, and from HGV traffic generated by the plant.
- c) **Accidents**, where we recognise that the operators have a major vested interest in protecting a very high cost asset from fire, escaped emissions and other incidents. However, concerns remain given the close proximity of residential areas and businesses, about the potential consequences in the event of operational accidents or failure of control systems, despite the operator's best endeavours. **A full risk assessment should be required** including contingency planning for a major incident and possible evacuation of local residents, businesses and HM Prison Ford.

## 5. IMPACT ON THE COMMUNITY

Council feels that this application will be extremely detrimental to the local amenity of residents, causing:

- increased noise, smell and pollution from operations and associated traffic,
- a blight on the landscape and open coastal plain, and the countryside setting of Clymping given the mass and height of the buildings and chimney,
- restrictions on the ability for residents to move safely but more sustainably around the village of Clymping at a time when we should discourage car use.
- fear of a major incident

No one should underestimate the fear and anxiety caused by such developments, whatever the technical arguments trotted out to counter this. The application is contrary to the provisions of Policies W11, W12, W15, W18, W19 of the West Sussex WLP and Policies of the Clymping Neighbourhood Plan CPN 7 *Protection of Open Views* CPN 14 *Traffic and Environment*. Given all this it is also obviously contrary to WLP Policy 10 that requires that:

*“The development of a site allocated [under (a)-(b)] must take place in accordance with the policies of this Plan and satisfactorily address the ‘development principles’ for that site identified in the supporting text to this policy”*

**For all of the above reasons this application should be rejected.**