

Lyminster & Crossbush Parish Council

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Response to Planning Application WSCC/036/20 Ford Energy from Waste, Grundon Waste Management, Viridor Waste Management

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Lyminster & Crossbush Parish Council objects to this application on the following grounds:

1. Visual impact on the surrounding land and specifically the South Downs National Park (part of which includes Lyminster & Crossbush) and the heritage asset comprising the Grade 1 Listed Arundel Castle. The scale, form, design, bulking and height (85m) of the scheme is entirely inappropriate and will create an enormous industrial blot on the lowland agricultural / rural landscape. We note with interest how far “wide of the mark” the application appears to be in terms of its design and the views on this from the South Downs National Park Authority contributing to our belief that the applicant has had very little regard for the wider community in making this application.
2. Departure from WSCC Waste Local Plan. Policy W10(c) - the application proposal will exceed the capacity designated to the Ford site by 45,000tpa. Policy W11 – the application will very clearly have an *“unacceptable impact to the character, distinctiveness, and sense of place of the different character areas of the County and that they reflect and where possible, reinforce the character of the main natural character areas.”* Policy W12 seeks to ensure that proposals for waste developments are of high quality where scale, form and design integrate to the character, topography, landscape and skyline – clearly not the case with this application.
3. Inadequate consideration of traffic impact and absence of appropriate mitigation measures. During an online consultation session, the applicant confirmed to us that they had had no engagement with Highways England with regard to the A27 Arundel Bypass evaluation currently taking place. We note also the proximity to the south of the site of the mainline Portsmouth to Brighton railway which could be utilised to great extent for the purpose of delivering waste to the site via use of a spur line. The Transport Assessment presented takes a “statutory minimum” approach and considers traffic movement only in very close proximity to the site. It fails entirely to consider existing traffic bottlenecks and problems for the existing road network in the wider area and the potential cumulative effect of the

proposed scheme on these. Specifically, we would like to draw attention to the enormous problem currently associated with the significant residential developments north of Littlehampton and the resultant traffic impact on the A284 Lyminster Road. The northern section of the proposed Lyminster Bypass yet to be delivered by WSCC, will provide no mitigation of the impacts of HGV movements associated with the Ford EFW because it is only a partial bypass of Lyminster. The “un by-passed” section of Lyminster Road has and will have only a single very narrow pavement, residential properties fronting directly onto the road, difficult access points to private driveways and narrow single carriageways. Existing Viridor HGV movements to the current planning application site are already entirely unsatisfactory and the likely cause of future accidents as these enormous vehicles straddle the centre markings on every bend. To add to the existing problem and undertake no form of traffic assessment here is entirely unacceptable.

4. The application has insufficient presentation of emergency procedures and risk assessment of accident scenario outcomes including failure of the plant resulting in significant unauthorised releases to the environment including air emissions to the wider community.

Other matters that we wish to comment on:

- We believe the approach taken by the applicant is cynical, disingenuous and has little regard for the community. The application follows an earlier application WSCC/096/13/F approved in 2015 for a similar but smaller scheme at the site. **During one of the online consultations Philip Atkinson (Grundon Estates Director) commented that the 2015 scheme was never going to be economically viable.** It is clear that the original scheme was merely “leverage” for the scheme now under consideration. It would be interesting to understand the draw on WSCC resources to have dealt with this earlier application given the applicant had no serious intention of pursuing it.
- We have challenged the applicant with regard to cancelling some elements of community engagement during Covid19 lockdown period and the fact that the consultation period should arguably be longer. No satisfactory response received.
- Community benefit. This is mentioned throughout the application and cited extensively in pre-application consultations. CHP heating for a small number of local homes and a tiny contribution to local employment are marginal benefits that in no way provide proportionate compensation for the array of negative impacts that the wider community will be saddled with for decades to come: traffic movements, atmospheric contamination, landscape and heritage view impacts, etc.

- The applicant presents the case that the proposed scheme provides a net carbon benefit. Minor adjustment to the underlying assumptions (alternative disposal routes, landfill degradation rates / future UK sustainable energy generation) would make for vastly different outcome numbers and render the presented argument meaningless. Incineration of waste is at the bottom of the waste hierarchy and a “last resort” and contrary to national policy.
- We are concerned at the lack of detail given with regard to the handling, processing and movement of bottom ash as a resultant by-product from the operation of the ERF. We would draw your attention to an example case study where the movement of contaminated materials with a high propensity to form airborne dust had very significant consequences https://en.wikipedia.org/wiki/Corby_toxic_waste_case
- We note that WSCC elected not to engage Lyminster & Crossbush Parish Council as a formal consultee despite the scale of this scheme and its location <1km from our parish boundary. We note also that the lead WSCC Planning Officer dealing with this case (until recently) shared previous employment (company and office) with the lead planning professional for the applicant. We assume WSCC is clear that all correct and necessary disclosures are on record and that no conflict of interest subsisted during the development and submission of the application.