

**FORD ENERGY RECOVERY FACILITY AND WASTE SORTING AND  
TRANSFER FACILITY, FORD CIRCULAR TECHNOLOGY PARK**  
EIA REGULATION 25 REQUEST AND REQUEST FOR INFORMATION FOR  
CLARIFICATION RESPONSE  
VIRIDOR ENERGY LIMITED, GRUNDON WASTE MANAGEMENT LIMITED  
AND FORD ENERGY FROM WASTE LIMITED  
MARCH 2021



## 1 Introduction

- 1.1 In June 2020 Viridor Energy Limited, Grundon Waste Management Limited and Ford Energy from Waste Limited (the latter a joint venture between Grundon Waste Management Limited and Viridor Energy Limited) submitted an application (WSSC/036/20) to West Sussex County Council (WSSC) for the demolition of existing buildings and structures, and the construction and operation of an energy recovery facility (ERF) and a waste sorting and transfer facility (WSTF) for the treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works at the Ford Circular Technology Park at Ford Road, Ford.
- 1.2 Following the submission of application WSSC/036/20 WSSC undertook consultation and in November 2020 issued an EIA Regulation 25 request for further information, together with a request for information for clarification purposes.
- 1.3 This new application (that replaces WSSC/036/20) has adopted these information requests as part of the required scope of the new application. The Regulation 25 and clarification information requirements are set out in sections 2 and 3 of this response document respectively. Against each information request is a cross-reference, signposting to where the information can be found in the environmental statement and / or other application documentation, together with a more detailed response.
- 1.4 WSSC's EIA Regulation 25 request letter, that includes the request for information for clarification purposes, is included in appendix 1 and selected (by WSSC) statutory consultee responses are included in appendix 2.

## 2 WSCC EIA Regulation 25 Request

Topic	Regulation 25 request	Location in ES and response
Traffic and transport	<ol style="list-style-type: none"> <li>1. A Stage 1 Safety Audit including a designer’s response in line with Appendix F of GG119 of the Design Manual for Roads and Bridges</li> <li>2. Information on how the development will support opportunities (as identified in the Walking, Cycling and Horse-Riding Assessment Report (WCHAR) to improve pedestrian/cyclist provision and an in particular:                             <ul style="list-style-type: none"> <li>• provision of a dedicated/ shared cycleway between the site and Ford Rail station and/or A259</li> <li>• consideration of viability of a connection between the site and Rollaston Park/Yapton Road</li> <li>• Improved provision of pedestrian/cyclist facilities from the site to Ford Road</li> </ul> </li> <li>3. A sensitivity test to assess the impact of the construction vehicles of phase 3 and the Ford Market proposals currently being assessed under app ref F/5/20 by Arun District Council</li> <li>4. Details of the impact of the development on the junction of the A259 and Church Lane during the construction phase peak period and network peak should the currently proposed improvements not be implemented at the time of construction. This should include modelling of the Construction Phase 3 peak and shoulder peak prior to implementation of junction improvements.</li> </ol>	<ol style="list-style-type: none"> <li>1. Stage 1 Road Safety Audit commissioned and completed in accordance with GG 119 and WSCC requirements. The Stage 1 Road Safety Audit appended to the Transport Assessment (Technical Appendix K).</li> <li>2. The proposed development will support such opportunities by engaging with a WSCC-led process, however it is noted that none of these opportunities are solely the responsibility of nor at the discretion of the proposed development. Therefore, a collaborative process of engagement within a WSCC-led process is the most effective way for the proposed development to support the opportunities identified. See Walking, Cycling and Horse-Riding Assessment Report (WCHAR).</li> <li>3. Undertaken modelling of site access junction in AM network peak and PM network peak, without and with Ford ERF &amp; WSTF traffic, for the 2025 Construction Year and 2026 Opening Year. Also undertaken a sensitivity test combining busiest hour construction traffic and busiest hour Ford Market &amp; Car Boot (FMCB, F/5/20) traffic on the site access junction. See Transport Assessment (Technical Appendix K).</li> <li>4. Using revised construction traffic flow data, undertaken local junction model of the A259/Church Lane roundabout based on current geometry per junction. Assessed AM network peak and PM network peak traffic during the peak Construction Year (2025). Peak construction phase traffic is higher than peak operational phase traffic. Model shows capacity is exceeded without construction phase traffic. Unable to assess shoulder peak due to the unavailability of suitable baseline data. It is assumed the “improvements not implemented at the time of construction” refer to the CM/1/17 mitigation scheme for the Church Lane / A259 roundabout. See Transport Assessment (Technical Appendix K).</li> </ol>
Cultural heritage	<ol style="list-style-type: none"> <li>1. A Visualisation of Viewpoint VP26 from Ford Lane Adjacent to Atherington House</li> <li>2. An additional Viewpoint and visualisation from the west end of Ford Church</li> <li>3. A visualisation of Viewpoint VP25 from outside St Mary’s church, Climping and closely adjacent medieval village earthworks</li> </ol>	<ol style="list-style-type: none"> <li>1. Figure 12.72 Visualisation View 26; chapter 10, paragraphs 10.112-10.113.</li> <li>2. Figure 12.70 Visualisation View 23; chapter 10, paragraphs 10.115-10.117.</li> <li>3. Figure 12.82 presents a Wireframe for View 25 proving the proposals will in no way be visible; chapter 10, paragraph 10.118.</li> </ol>

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	<ol style="list-style-type: none"> <li>4. A Viewpoint and Visualisation VP 31, from Arundel Castle</li> <li>5. A Viewpoint and Visualisation from Church Cottages and Crispin's Cottage, within the Conservation Area on the west side of Church Lane, Yapton</li> <li>6. Viewpoint and Visualisation from Tortington Priory</li> <li>7. An archaeological investigation and recording of buried remains of the canal through the application site, where it would be affected by development and a report of the investigation and recording. The scope of the archaeological investigation and recording (as mitigation) will need to be defined in relation to the density of piling, earthworks and other excavations in relation to the line of the canal</li> <li>8. An additional Viewpoint and Visualisation from the west end of Ford Church (similar to the request from WSSC Environment and Heritage and WSSC Landscape Consultant)</li> <li>9. A Viewpoint and Visualisation from the Conservation Areas at Yapton and Lyminster</li> <li>10. Provide a Viewpoint and Visualisation VP 31, from Arundel Castle and/or from other significant high points at the top of the town e.g. from St Nicolas' Church and Arundel Cathedral</li> </ol>	<ol style="list-style-type: none"> <li>4. Figure 12.76 Visualisation View 31; chapter 10, paragraphs 10.125.</li> <li>5. Figure 12.71 Visualisation View 24 and 12.79 Visualisation View 35; chapter 10, paragraphs 10.119 – 10.120.</li> <li>6. Figure 12.73 Visualisation View 28; chapter 10, paragraph 10.123.</li> <li>7. The archaeological potential has been considered within chapter 10 with proportionate mitigation for possible remnant archaeological features proposed within the Mitigation section to be secured by way of a pre-commencement planning condition; chapter 10, paragraphs 10.96-10.97; 10.129-10.132.</li> <li>8. Figure 12.70 Visualisation View 23; chapter 10, paragraphs 10.115-10.117 .</li> <li>9. Figure 12.71 Visualisation View 24 and 12.79 Visualisation View 35 (Yapton); chapter 10, paragraphs 10.119 – 10.120 &amp; Figure 12.61 Visualisation View 12 (Lyminster); chapter 10, paragraph 10.122.</li> <li>10. Figure 12.76 Visualisation View 31; chapter 10, paragraphs 10.125.</li> </ol>
Public rights of way	<ol style="list-style-type: none"> <li>1. Details of how the existing Public Right of Way (PROW Footpath 200 3) is to be accommodated</li> </ol>	<ol style="list-style-type: none"> <li>1. See Chapter 3 of ES and DAS.</li> </ol>
Trees	<ol style="list-style-type: none"> <li>1. To demonstrate that the scheme is deliverable and likely to be successful, particularly around the boundaries of the site, notably to the south and west, provision of a full, detailed planting specification together with details of suppliers</li> <li>2. Provision of a comprehensive Landscape and Ecological Management Plan (LEMP)</li> </ol>	<ol style="list-style-type: none"> <li>1. Landscape planting will take place during phase 5 of the construction programme (i.e. the last 12 months of the 51 month construction programme). The applicants are therefore yet to appoint a landscape contractor. Prior to the commencement of the development, a landscape scheme detailing all planting and seeding proposals will be submitted to and approved in advance by WSSC. As set out in the Arboricultural Impact Assessment (Section 13): 'Any existing trees shown to be retained, or trees and shrubs to be planted as part of the landscaping scheme that are removed, die, become severely damaged beyond recovery or diseased within 2-5 years of the completion of the development (dependent on planning Conditions), shall be replaced within the next planting season with trees or shrubs of appropriate size and species that complement the existing tree stock.' The applicants will therefore ensure the proposed planting scheme is deliverable and successful.</li> </ol>

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Landscape design	<ol style="list-style-type: none"> <li>1. Provision of a plan showing existing features, such as the offsite coniferous tree belt and public rights of way to provide context and a corrected north point</li> <li>2. Provision of revised scrub planting and hedgerow mixes that are better informed by the local ecology</li> <li>3. Provision of additional native tree planting, rather than reliance solely on scrub mix on the bunds</li> <li>4. Additional tree and shrub planting within the two car parking areas (to north-east and south-west) to provide greater ecological enhancement, amenity and natural shading and provide some separation and enclosure for the car parks from the wider EfW site</li> <li>5. Consideration should be given for the long-term prospects of the off-site coniferous tree belt and suitable advance tree-planting should be proposed to ensure a continuation of screening of sensitive views from the north</li> <li>6. Provision of additional details of the flint walls</li> <li>7. Provision of evidence of the former canal on the eastern boundary to give context for visitors</li> <li>8. Provision of details of the construction of the pond and related planting</li> <li>9. Provision of revised details of the routing of the nature trail path to proving more meaningful and appealing route for staff</li> <li>10. Provision of details of proposals for the tear-drop shaped area of land to the north-west of the site including its landscaping, the access roads and their verges, given its close proximity to future housing within the Ford Strategic Housing Allocation site (Allocation SD8 in the Arun Local Plan 20011-2031)</li> <li>11. Provision of details of planting which should include climbers to the acoustic fence to enhance biodiversity and mitigate their appearance whilst the trees and shrubs are establishing</li> <li>12. Provision of details of the colour and design of the security fence with a colour and design selected that minimises its visual impact. Gates required for access and maintenance should also be shown. It should also be ensured that sufficient gaps are left to allow species such as hedgehogs to pass through the fence and access the newly created habitat</li> </ol>	<p>2. Anticipated to be conditioned.</p> <ol style="list-style-type: none"> <li>1. Please refer to 2829-001-01 – Landscape Softworks GA. PRoW are not shown on the landscape design but are included on the TOR visual receptor plan.</li> <li>2. The proposed scrub has been reviewed by the project ecologist and is satisfactory. Note there is no defined West Sussex hedgerow specification to inform the mix.</li> <li>3. Please refer to 2829-001-01 – Landscape Softworks GA.</li> <li>4. This is related to a previous design. The new design has maximised the amount of tree planting and ecological enhancement within the site footprint. Please refer to 2829-001-01 – Landscape Softworks GA.</li> <li>5. The conifers are not being lost with the current design and appear to be in good health. To mitigate any loss of these trees large stock has been planted along the northern boundary, broadly in the same extent to mitigate their loss should it occur. Please refer to 2829-001-01 – Landscape Softworks GA.</li> <li>6. Flint walls detail to be provided at detailed design.</li> <li>7. Blue Block paving has been provided within carparking in the site. In addition a pond and flint wall marking the alignment on the western side has also been provided. Please refer to 2829-001-01 – Landscape Softworks GA.</li> <li>8. Details of pond and planting to be provided at detailed design.</li> <li>9. This is related to the previous design. There is no nature trail provided, however there is a breakout area provided and staff can walk around the top of the bund to the eastern area but it will not be a formalised route. Please refer to 2829-001-01 – Landscape Softworks GA.</li> <li>10. This is outside of the Scheme design.</li> <li>11. This is related to a previous design. No climbers are proposed on the acoustic fencing, however the colour and finish will be to mitigate visual impacts. There will be mature stock planted along the northern boundary which will soften the appearance of the fencing to views to the north. For planting please refer to 2829-001-01 – Landscape Softworks GA and for fencing details please refer to 1404_PL108_FENCING LAYOUT_1:500NS.</li> <li>12. Please refer to 1404_PL108_FENCING LAYOUT_1:500NS</li> <li>13. This is related to a previous design. The detail of gabion fill will be provided at detailed design.</li> </ol>

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	13. Provision of details of the surfacing beyond the area of paving around the entrance foyer and the fill to be used in the gabions	
Landscape implementation and management plan	1. Submission of a soil survey to support the Landscape Implementation and Management Plan to ensure there is no on-site contamination or compaction and to ensure the long-term success of the landscape proposals	1. This will be addressed at detailed design, but the specification will include that soil to be imported to comply with BS3882:2015 and any compost to be incorporated to comply with BSI PAS 100. An update to the landscape management plan will be included.
Landscape and visual impact assessment methodology	<p>1. There are a number of important and significant omissions in terms of the viewpoints and visualisations that need to be addressed. These are included as Appendices A and B in WSSC's Regulation 25 letter dated 20<sup>th</sup> November 2020 (see technical appendix A for details)</p> <p>2. Supplementary viewpoints requested:</p> <ul style="list-style-type: none"> <li>• Close PRow to north and west of site (366/ 363/ 200-2 Old Canal)/ 200-3/200- 4/359) which will be within The Landings</li> <li>• Close PRow 175 to south of site which will be within The Landings)</li> <li>• Riverside PRow further south than VP 1</li> <li>• From western side of churchyard of St Andrew's, Ford</li> <li>• Views from sea</li> </ul> <p>3. Supplementary visualisations requested:</p> <ul style="list-style-type: none"> <li>• Poling Street</li> <li>• East of Littlehampton</li> <li>• Night view from Nore Folly</li> <li>• Ford Lane</li> <li>• Lyminster Conservation Area</li> <li>• Ford Airfield</li> <li>• North edge of Middleton on Sea</li> <li>• SDNP PROW</li> <li>• A259 Bognor</li> <li>• St Mary's Climping</li> <li>• Ford Lane</li> <li>• North of Arundel Castle</li> <li>• Arundel Castle Keep</li> <li>• West of Littlehampton</li> <li>• PROW 166 south east of Burndell / Yapton</li> </ul>	<p>1. Viewpoints have been reviewed and detailed discussions took place during November and December 2020 with WSSC officers including landscape and cultural heritage advisers, to agree new viewpoints and visualisations. Following this, amendments and additions were made to the viewpoints incorporating all but a few of the suggested additions. These are all described in Chapter 12 and figures 12.16 and 12.17 show the representative viewpoint locations. See Chapter 12.</p> <p>2. As above.</p> <p>3. As above.</p>

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	<ul style="list-style-type: none"> <li>• Horsemere Green</li> <li>• West of Rodney Crescent</li> </ul>	
Landscape baseline	<p>1. They advise that insufficient consideration has been given in the landscape baseline to recreational value or perceptual qualities (including openness and tranquillity) and the long views to the South Downs which are a highly distinctive and very apparent due to the low-lying and flat landscape with relatively few trees. They advise that the West Sussex Landscape Character Assessment highlights key characteristics of the Chichester to Yapton Coastal Plain and the Lower Arun Valley and that a more detailed and revised examination of the landscape baseline is required. Further details are set out in the comments of The County Council's Landscape Consultant, although your attention in particular is drawn to the comments relating to; the Goodwood to Arundel Wooded Estate Downland and need to pay attention to panoramic views, for example from the viewpoint at The Trundle, in planning any change in this or adjacent areas, including areas outside the National Park boundary; and there being no consideration of the potential effects on the seascape for South Marine Plan Areas (Marine Character Area 7: Selsey Bill to Seaford Head)</p>	<p>1. To address these points the baseline has been expanded to include additional character areas and additional analysis. More references are made to the WSSC character assessment. Regarding the SDNP comments, the new SDNP landscape character assessment (not extant at the time of the first submission) has been referred to and five new SDNP character areas have been identified and included in the assessment. In addition, the Marine character area 7 has also been included as a landscape receptor. See Chapter 12.</p>
Assessment of landscape effects	<p>1. Further consideration needs to be given to individual elements that comprise landscape character and to the effects on key characteristics of landscape character as defined in the West Sussex Landscape Character Assessment that a development of this scale and height could have. This should include review of the existing Landscape Character Assessments as details on the comments of the County Council's landscape consultant including further detailed surveys of the application site and its immediate setting or surroundings. This should include an analysis of the extent to which the site and its immediate surroundings conform to or are different from the wider Landscape Character Assessments that exist, and to pick up other characteristics that may be important in considering the effects of the proposal. (GLVIA 5.16)</p> <p>2. Re-assessment of the Landscape effects on the site (L 1) is required</p> <p>3. Re-assessment of the landscape effects on the South Downs National Park (L 13) is required</p> <p>4. Consideration needs to be given to night-time landscape effects including the potential effects of plume at night, with light sources</p>	<p>1. As stated above, further reference has been made to the WSSC character assessment and in a series of site visits in late 2020, and early 2021, the site's setting and surroundings have been further looked at and a very good understanding of the current character area gained sufficient for LVIA purposes.</p> <p>2. The site, receptor L1 has been re-assessed and the assessment on the SDNP has been re-assessed and broken down into a much greater level of detail by subdividing into five new SDNP receptors, L13, L14, L15, L16 and L17.</p> <p>3. See 2 above.</p> <p>4. Night-time effects are fully considered in the assessment. It is acknowledged that in certain atmospheric conditions, there may be a degree of light reflecting off condensed water droplets. All light sources in the development will produce zero upward light pollution and so would not contribute to any reflected light. The area around Ford, Climping and Yapton has a large amount of ambient light from various sources and the amount of light glow from the plume would not</p>

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	<p>reflecting on the water droplets in vapour, and its likely contribution to eroding the rural character of the area</p>	<p>add significantly to the baseline light glow experienced in the area. See Chapter 12.</p>
Visual baseline	<ol style="list-style-type: none"> <li>1. The grouping of viewpoints requires reconsideration. Visual receptors in Conservation Areas, that are highly sensitive, should be assessed separately rather than in combination with other less sensitive receptors</li> <li>2. Further consideration needs to be given to the visual impact on the future residents of Ford Strategic Housing Allocation site, who will be living in close proximity to the site with its limited onsite screening, particularly in terms of the provision of more effective screening</li> <li>3. Further consideration needs to be given the impacts on the PRow in the immediate vicinity such as 200-3 and 363, including the provision of additional viewpoints (included in Appendices A and B below)</li> <li>4. Some viewpoints, for example those representing views from St Andrew's Church (Viewpoint 14), should be taken from nearer to the receptor, for example in the churchyard to the front of the church where there are some open views to the site, to give a better impression of the existing view</li> <li>5. For clarity the report should include those photographs which were not able to be taken due to Covid-19 and form part of 'The Landings' submission</li> </ol>	<ol style="list-style-type: none"> <li>1. Visual receptors have been regrouped as requested and the residents of the conservation areas at Yapton have been separately assessed. See Chapter 12.</li> <li>2. Consideration is given to the future residents of the strategic housing allocation site by making them into a new visual receptor group VR6. See Chapter 12.</li> <li>3. Footpaths in the immediate vicinity have been reviewed in site visits in late 2020 and early 2021 and new viewpoints as covered in the response above have been provided. See Chapter 12.</li> <li>4. A new view representing St Andrew's Church from the location suggested by WSSC has been provided See Chapter 12</li> <li>5. The matter of Covid restrictions on photography and survey has been resolved and the requested views as agreed have been taken, surveyed and included in the LVIA chapter. See Chapter 12.</li> </ol>
Assessment of visual effects	<ol style="list-style-type: none"> <li>1. The magnitude of visual effects needs to be reassessed (see the comments from the Council's landscape consultant) and the missing visualisations included (see Appendices A and B below). You should also take into account the advice on the evaluation of the landscape as lacking distinctiveness in undertaking the re- assessment</li> <li>2. The grouping of viewpoints needs to be re-examined and regrouped reassessed (see the comments from the Council's Landscape consultant)</li> <li>3. Further consideration needs to be given to the impact of the proposed built form (including the stack and plume) where it breaks the horizon, including that of the South Downs or crosses the offing (the area of the sea seen below the horizon) in views from the north</li> <li>4. Further consideration needs to be given to the choice of colours of the proposed built form and how they reflect the landscape character and might lessen the visual impact</li> </ol>	<ol style="list-style-type: none"> <li>1. The magnitude of effects has been re-assessed as part of the full re-assessment of the amended scheme. TOR are satisfied that the evaluation of the landscape value, susceptibility and sensitivity are in accordance with the appropriate guidelines and in accordance with the stated methodology. See Chapter 12.</li> <li>2. Grouping of visual receptors has been broken down into smaller groups and new receptor groups identified. See Chapter 12.</li> <li>3. Impacts of the development including skyline, offing and horizon effects have been a key consideration in the design process for the amended development with the chief measure being a substantial reduction in the height of the development coupled with a review of external materials and colour leading to a much lighter and much less obtrusive design. See Chapters 3 and 12.</li> <li>4. See above.</li> </ol>



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Visualisations	<ol style="list-style-type: none"> <li>The Council’s Landscape Consultant has advised that some of the viewpoints closest to the site, where one would expect the effects to be most noticeable are lacking visualisations, specifically viewpoint 26 (Ford Lane) and Viewpoint 36 (Rodney Crescent). These should be provided</li> <li>They also advise that the visualisations do not show the plume which, although potentially visible on only approximately 25% of days, would still be a noticeable feature, and would draw attention to the built-form. Additional visualisations should be provided to show the plume</li> <li>Of the viewpoint photographs which lack visualisations attached in Appendix B below, visualisations should be provided</li> </ol>	<ol style="list-style-type: none"> <li>Viewpoints have been reviewed and detailed discussions took place during November and December 2020 with WSCC officers including landscape and cultural heritage advisers, to agree new viewpoints and visualisations. Following this, amendments and additions were made to the viewpoints incorporating all but a few of the suggested additions. These are all described in Chapter 12 and figures 12.16 and 12.17 show the representative viewpoint locations. See Chapter 12.</li> <li>The applicant believes that due to the frequency of appearance of the plume, it would not be representative to show it on visualisations. Refer to Plume Visibility Modelling Results in the Air Quality, Odour and Dust Technical Appendix (TA C).</li> <li>See 1 above.</li> </ol>
Air quality and emissions	<ol style="list-style-type: none"> <li>An emissions mitigation statement that includes proposed mitigation measures which should equal the health damage cost, with mitigation options designed into the development in accordance with the Standard Mitigations and Table 2 of Air Quality &amp; Emissions Mitigation Guidance for Sussex (Sussex Air Quality Partnership (2020) available at <a href="https://sussex-air.net/ImprovingAQ/GuidancePlanning.aspx">https://sussex-air.net/ImprovingAQ/GuidancePlanning.aspx</a>)</li> <li>Details of the proposed improvements for cycling and pedestrian connections in accordance with Section 3.1 of the submitted Walking, Cycling and Horse Riding Assessment Report dated June 2020 by Ramboll</li> <li>Details of the EV charge points for staff parking and vehicles used on site</li> <li>Geographical odour modelling in the vicinity of the site to support the conclusions of the Environmental Statement along with confirmation of the OEU levels caused from the site by the operation in the worst case scenario</li> <li>A cumulative assessment of odour impacts the biogas digester and lagoon to the north of Ford Lane, and Besmoke on Ford Lane</li> <li>Provision of amended lighting details and an assessment designed in accordance with Zones E2/E3 rather than Zones E3/E4</li> </ol>	<ol style="list-style-type: none"> <li>The Emissions Mitigation Statement has been updated to include measures already included in the design of the proposed development, this includes details of the proposed improvements for cycling and pedestrian access, details of the EV charging points.</li> <li>See updated Walking, Cycling and Horse Riding Assessment Report (March 2021).</li> <li>Details on EV charge points anticipated to be conditioned.</li> <li>Odour modelling has not been carried out, the assessment has been carried out on a source-receptor-pathway approach rather than specific modelling. See ES chapter 6.</li> <li>See 4 above.</li> <li>Amended lighting plan has been prepared. See plan and ES Chapter 3.</li> </ol>
Noise and vibration	<ol style="list-style-type: none"> <li>They advise that the Acoustic Report (Technical Appendix J: Noise and Vibration Assessment) June 2020 and the ES Chapter 14 need to be amended to take account of the development right across the Ford Strategic Housing Allocation site and not just the defined R5 receptor and that it should take into account the phasing of the development and</li> </ol>	<ol style="list-style-type: none"> <li>A more detailed assessment of the operational noise on the wider Ford Strategic Housing Allocation (and not just the defined R5 and R6 receptors) cannot be provided as the residential development proposals are only at masterplan stage. Operational noise contour plots (as previously provided) have been provided in Figures 14.13-</li> </ol>

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	<p>include Ford Prison as a noise sensitive receptor. They advise that greater clarity needs to be provided of effect of the phasing of development on the adjacent Ford Strategic Housing Allocation site, so that the impact, particularly of the construction phase (which will be lengthy) is fully understood. Noise contours should be provided illustrating impact of the construction phase and the operation phase on the Ford Strategic Housing Allocation site</p> <p>2. Revision of the Acoustic Report to explain why the entire 24-hour period on the 9th and 10th February 2020 has been excluded from the long-term noise survey, provide definition of the “relatively short duration”</p>	<p>14.15 and in Technical Appendix J. Additional receptor locations cannot be assessed without additional baseline noise surveys, to determine the background noise levels. Additional surveys and assessment at this stage would not be beneficial as a fixed future layout of the housing allocation is not available. Chapter 14 states that likely effect levels will reduce with increased distance from the proposed ERF and WSTF site. Effects are further likely to reduce once proposed residential dwellings are in place to screen noise emissions to those dwellings at increased distance from the ERF and WSTF site. Chapter 14 and Technical Appendix J consider Ford Prison as a receptor location.</p> <p>2. Construction noise modelling has been completed and construction noise contour plots are provided in Figures 14.6-14.12 and in Technical Appendix J. The noise contour plots provide a visual means of evaluating likely effects. An assessment of construction noise levels has been made to the Ford Strategic Housing allocation in Chapter 14 and Technical Appendix J (for receptor locations R5 and R6). The nearest proposed residential dwellings (shown on the Illustrative Masterplan for the residential site) have been included in the construction noise modelling for scenarios included construction of the ERF and landscaping works. However, a more detailed assessment against the phasing of the Ford Strategic Housing allocation cannot be made, as detailed construction phasing information has not been made available by the applicant for the development on the housing allocation land.</p>
Landscape	<p>1. Provision a detailed of the landscaping plan and specification demonstrating how mitigation and screening and screening in relation to existing and future residents and existing and proposed sports facilities, will be provided and how the landscape setting and biodiversity improvement and enhancement will be achieved</p>	<p>1. Please refer to 2829-001-01 – Landscape Softworks GA and the LVIA chapter of the ES. Please refer to the ecological chapter of the ES, Chapter 13.</p>
South Downs National Park	<p>1. The South Downs National Park Authority (SDNPA) have commented that the proposal will have substantial adverse impacts on views and experiential qualities of the National Park and its setting. It 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. This is acknowledged in the landscape and visual impact</p>	<p>1. The Design and Access Statement will cover what is now not a 'visually dynamic architectural landmark' and how the design responds to mitigating its visual impact in scale / height / form / materials, and explain why the use of 'green/living' walls has been rejected in favour of landform bunding and planting.</p>

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	<p>assessment. Accordingly, a more explicit assessment of the impact on the South Downs National Park is required. As part of this the approach of creating a 'visually dynamic architectural landmark', needs to be justified and explained in this context. Further information is also requested regarding the consideration given to the mitigation measures to reduce the adverse impacts on the National Park and to how the development of the site could best harmonise the proposal with the landscape, including the use of material finishes and colours</p> <p>2. The detailed comments from the SDNPA suggest exploring further a reduction in the scale and height of the building(s) and stack and other measures to reduce the visual impact and giving further consideration to the use of 'green/living' walls</p>	<p>2. The South Downs Landscape Character Assessment October 2020 (not extant at the time of the first application) has been reviewed and referenced and the LVIA assessment has further subdivided the SDNP receptors into into five new SDNP receptors, L13, L14, L15, L16 and L17 providing a much greater level of detail and explanation as to the effects on the SDNP.</p> <p>3. The applicant has recognised the concerns raised regarding a 'landmark building' approach and the re-design based on a process that allows a significantly smaller development has enabled the adoption of a different design strategy to minimise the landscape and visual effects which works for both near and middle distance receptors, as well as for more distant receptors within the SDNP. Refer to Chapter 3, The proposals, Chapter 12, Landscape and Visual effects and the Design and Access Statement.</p>

**Table 5.3: Additional issues raised in WSCC Regulation 25 request**

### 3 WSCC request for information for clarification purposes

Topic	Clarification request	Location in ES and response
Visual impact	<p>1. You will be aware from our recent discussions following the initial round of consultation that the application has raised significant concerns about the scale, bulk and height of the building(s) and stack and of the need for additional measures to reduce the visual impact (as is reflected in the comments of consultees set out above). We would therefore strongly advise that further consideration is given to this matter, including consideration of the overall design, with a view to minimising the height of the buildings and further mitigation achievable through the choice of colour and materials palette and extended landscaping provision (see our further comments below). This should include an explanation/demonstration that the buildings cannot be constructed below the existing ground level and alternative technology options which may enable a lower and/or smaller buildings to be designed</p>	<p>1. The applicant has recognised the concerns raised regarding a 'landmark building' approach and the re-design, based on a process that allows a significantly smaller development, has enabled the adoption of a different design strategy to minimise the landscape and visual effects. The measures include lowering of the building to the greatest extent possible without incurring unacceptable effects on ground water levels. Refer to Chapter 3 The proposals, Chapter 4 Alternatives, Chapter 12 Landscape and visual effects, Technical Appendix G – Hydrological Impact Assessment, also Chapter 3 of the Planning Supporting Statement, the Design and Access Statement and Chapter</p>

Topic	Clarification request	Location in ES and response
Landscape and visual impact and cultural heritage	<p>1. You will see from the consultation responses that there have been a number of concerns, and in some cases disagreement, with the conclusions of the Environmental Statement and supporting technical appendices. This is particularly the case in relation to the landscape and visual impact assessment and impacts on heritage. We would therefore advise that you review, amend as necessary and update the assessments in the light of the preparation and submission of the additional information listed above</p>	<p>1. Viewpoints have been reviewed and detailed discussions took place during November and December 2020 with WSCC officers including landscape and cultural heritage advisers, to agree new viewpoints and visualisations. Following this, amendments and additions were made to the viewpoints incorporating all but a few of the suggested additions. These discussions and reviews have informed the strategy for minimising landscape and visual effects been fully re-assessed. These are all described in Chapter 12 and figures 12.16 and 12.17 show the representative viewpoint locations. See Chapters 12 Landscape and Visual effects and Chapter 10 Cultural Heritage.</p>
Design	<p>1. With regard to the exterior design of the proposed buildings we would recommend that you submit an updated Design and Access Statement, particularly with regard to the final form and appearance of the development. This should demonstrate that the design has taken into account issues raised by consultees and that the opportunities that have been considered to deliver a building that contributes positively to the character and quality of the area and promotes community acceptance of waste facilities through high quality design. This should include an explanation of why the plant has to be the size proposed, and whether a smaller capacity facility could not deliver any substantive reduction in the buildings height and scale</p>	<p>1. See updated Design and Access Statement and chapter 3 of the Planning Supporting Statement. The size of the ERF and the WSTF have delivered a substantive reduction in height and scale in this revised proposal, without a reduction in the capacity. A further reduction in scale of the buildings is not possible unless the capacity was reduced to an unviable level of throughput. This is addressed further in chapter 3 of the Planning Supporting Statement.</p>
Landscape design	<p>1. In addition to the details requested by the Council's Tree Officer, as set out above, other planting opportunities for landscaping and tree planting that have been considered, both on and off-site, should be identified. The relationship with the Ford Strategic Housing Allocation site will be particularly critical, as well as the impact on the nearby heritage assets and public rights of way, particularly to the north-west, north and east of the site</p>	<p>1. See Arboricultural Impact Statement, the Landscape Management Plan and Chapter 12 of the ES.</p>
Landscape design	<p>1. Clarity is requested on what, if any, landscaping provision is proposed to the northern boundary of the site and the teardrop shaped area to the northwest. This should identify what is proposed in relation to existing conifers, what if any screening at a lower level would be provided along this boundary, and how this would be maximised. Because the proximity of the Public Rights of Way network, this is an important issue in relation to public access to the area immediately around the site to the north</p>	<p>1. The landscape screening along the northern boundary generally has been increased in the revised proposals, including both earth mounding and new planting, and this has been maximised. The existing conifers are off site, but the proposed bund and planting within the site provides another layer of screening in addition to these. Note that the teardrop shaped area is not now included within the application site boundary (see PSS chapter 3). The lower boundary will be a flint wall with a hedgerow on top, reflecting local character. Please</p>

Topic	Clarification request	Location in ES and response
		refer to 2829-001-01 – Landscape Softworks GA. PHoW's are not shown on the Landscape Design but are shown on the site layout plan and are taken into account in the LVIA, see Chapters 3 and 12.
Planning	1. In the light of any review, amendment and updating of the assessments we would also advise that you provide an updated appraisal of how the development is seen to accord with the individual 'development principles' for the 'Site north of Wastewater Treatment Works, Ford', a requirement (W10) of the West Sussex Waste Local Plan (April 2014), Policy W10, where necessary, drawing evidence from the Environmental Statement	1. A new Planning Supporting Statement is submitted that includes appraisal of compliance with the development principles of Policy W10, see chapter 7. This draws on the evidence from the ES.
Cumulative impact	1. As has been raised by Arun District Council and the neighbouring developer, because of the constraints of the site and the concurrent proposals for the development on the Ford Strategic Housing Allocation site, it is important that the applicants and the developer of the adjacent site seek to cooperate to produce proposals that work together and incorporate adequate mitigation across the two schemes. This is required to ensure compatible development which both safeguards the amenity not only of future residents of the Ford Strategic Housing Allocation site, on the one hand, but also the business, schools and other mixed uses proposed, and the operation of the energy recovery facility and waste sorting and transfer facility, on the other. The provision of noise, odour and lighting contours and mapping of sun light/overshadowing on the Ford Strategic Housing Allocation site needs to be explicitly addressed, showing which, if any areas of the allocation would be affected or the use of which would be sterilised. The County Council appreciates the applicants cannot require the developer for the Ford Strategic Housing Allocation site to co-operate, but nonetheless continued communication is encouraged to ensure that where necessary suitable separation buffers and/or mitigation are investigated and clearly identified.	1. Twenty-three projects have been considered cumulatively in the ES, including The Landings proposals at Land at Ford Airfield. Specifically, operational noise contour plots (as provided in the original submission) have been provided which show the expected noise levels for the wider Ford Strategic Housing Allocation site. The noise contours are provided in Figures 14.13-14.15 and Technical Appendix J.
Proposals	1. Confirm if there is a need for a minimum volume of residual waste to be stored on site to allow continuous generation of electricity and how is this managed?	1. The waste bunker is sized to provide for capacity equivalent to approximately five days of waste storage which provides flexibility around periods when there are no waste deliveries. This therefore allows for the continuous generation of electricity for up to five days with no deliveries.

Topic	Clarification request	Location in ES and response
Planning	1. Provide an updated assessment of need and the sources of waste to be managed, taking into account the latest West Sussex Joint Minerals Local Plan and Waste Local Plan: Monitoring Report 2018/19	1. See chapter 5 of the Planning Supporting Statement.
Traffic and transport / noise / community and social	1. Provide an assessment of the impacts on amenity for properties and highway footpath users along the route of HGVs in the light of the changes as a result of use of larger HGVs now proposed. This point does not appear to have been addressed or is not apparent in the submitted noise and vibration assessment	1. Assessment of construction HGV noise and the operational changes in road traffic noise levels (including HGVs) was provided in the earlier submission, as per the methodologies agreed with Arun District Council. Negligible effects were predicted for both construction and operational HGVs. This has again been provided in the updated assessment. There is no accepted standard assessment methodology for the impact of HGVs for highway footpath users and it is expected that this would be covered by the assessments provided. The predicted changes in operational road traffic noise levels are detailed in Chapter 14 and Technical Appendix J (in terms of Basic Noise Levels at 10m from the edge of the carriageway, as per the methodology of the Calculation of Road Traffic Noise 1988). Any additional assessment would be bespoke and could not be assessed against typical criteria.
Accident risk management	1. Give consideration to the risk of major accidents which has been raised as an issue by a number of consultees and third parties. Can you therefore please provide an assessment of potential accident risks and how these will be managed	1. See Appendix 3 to this report – Table A4 has been extracted from the Ford ERF Environmental Risk Assessment, prepared by Fichtner Consulting Engineers Ltd and submitted to the Environment Agency as part of the Environmental Permit application suite of reports.

**Table 5.4: Additional information requested by WSSC for clarification**

## **Appendix 1**

### **WSCC EIA Regulation 25 Request and request for information for clarification, 20<sup>th</sup> November 2020**

**Michael Elkington**  
Strategic Planning Manager

Please respond to: Andrew Sierakowski  
Tel: (+44) 0330 2222672  
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**County Planning**

County Hall  
Chichester  
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Tel: 01243 642118



Mr Steve Molnar  
Technical Director,  
Terence O'Rourke Ltd,  
Everdene House,  
Deansleigh Road,  
Bournemouth,  
BH7 7DU

20<sup>th</sup> November 2020

Dear Mr Molnar,

**Application Number:** WSCC/036/20  
**Address:** Ford Circular Technology Park, Ford Road, Ford, Arundel BN18 0XL.  
**Proposal:** 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

**Town and County Planning Act 1990 (as amended)**

**The Town and Country Planning (Environmental Impact Assessment) Regulations 2017**

**Regulation 25 Further Information and Evidence Respecting Environmental Statements**

I refer to the above application and write, in accordance with Regulation 25 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, to formally request that further information be submitted to West Sussex County Council ("the Council").

The submission of the following information is seen to be essential further information in respect of the application to verify the particulars of the submitted development proposals, and to enable proper consideration of the likely environmental effects. Notwithstanding any further information that may later be deemed necessary, the following information will be required to enable the Council to determine the application. If the requested information is not supplied, then the likely conclusion would be a refusal of the application on grounds of lack of information.

The following details are listed to correspond to the comments from selected consultees and accordingly are listed under the heading of each consultee, providing a summary of the additional information requested. For complete details please see the full comment from each consultee attached with this letter. They also are available on the County Council's website at: <https://westsussex.planning-register.co.uk/Planning/Display/WSCC/036/20>. Where consultees are not listed below, this is because they have not requested additional information to enable full consideration of the environmental effects. This does not mean they have not



commented on the application and given their advice, including in some instances their grounds for objection.

You will note that there is some overlap in the information requested by different consultees, particularly in relation to the requests for additional viewpoints and visualisations. Where this is the case, I have listed each request individually, but it may be appropriate to provide the same information where two or more requests for that information has been made.

In addition, I have listed additional information that is requested in support of the planning application, but not requested under Regulation 25.

If you consider that any of the requested further information has already been submitted, please provide details of where in the submitted information it can be found.

### **Highway Authority (See full comments from WSCC Highways)**

Have requested the following additional information:

- A Stage 1 Safety Audit including a designer's response in line with Appendix F of GG119 of the Design Manual for Roads and Bridges;
- Information on how the development will support opportunities (as identified in the Walking, Cycling and Horse-Riding Assessment Report (WCHAR) to improve pedestrian/cyclist provision and in particular;
  - provision of a dedicated/ shared cycleway between the site and Ford Rail station and/or A259;
  - consideration of viability of a connection between the site and Rollaston Park/Yapton Road; and
  - Improved provision of pedestrian/cyclist facilities from the site to Ford Road;
- A sensitivity test to assess the impact of the construction vehicles of phase 3 and the Ford Market proposals currently being assessed under app ref F/5/20 by Arun District Council; and
- Details of the impact of the development on the junction of the A259 and Church Lane during the construction phase peak period and network peak should the currently proposed improvements not be implemented at the time of construction. This should include modelling of the Construction Phase 3 peak and shoulder peak prior to implementation of junction improvements.

### **Environment and Heritage (See full comments from WSCC Environment and Heritage Team)**

The Council's Environment and Heritage team have requested the following additional information:

- A Visualisation of Viewpoint VP26 from Ford Lane Adjacent to Atherington House;
- An additional Viewpoint and visualisation from the west end of Ford Church;
- A visualisation of Viewpoint VP25 from outside St Mary's church, Climping and closely adjacent medieval village earthworks;
- A Viewpoint and Visualisation VP 31, from Arundel Castle;
- A Viewpoint and Visualisation from Church Cottages and Crispin's Cottage, within the Conservation Area on the west side of Church Lane, Yapton;

- A Viewpoint and Visualisation from Tortington Priory; and
- An archaeological investigation and recording of buried remains of the canal through the application site, where it would be affected by development and a report of the investigation and recording. The scope of the archaeological investigation and recording (as mitigation) will need to be defined in relation to the density of piling, earthworks and other excavations in relation to the line of the canal.

### **Public Rights of Way (PROW) (See full comments from WSCC PROW)**

The Council's PROW team has requested the following additional information:

- Details of how the existing Public Right of Way (PROW Footpath 200 3) is to be accommodated.

### **Trees**

The Council's Tree Officer has requested the following additional information:

- To demonstrate that the scheme is deliverable and likely to be successful, particularly around the boundaries of the site, notably to the south and west, provision of a full, detailed planting specification together with details of suppliers; and
- Provision of a comprehensive Landscape and Ecological Management Plan (LEMP).

### **Landscape (See full comments from WSCC Landscape Consultant)**

The Council's Landscape Consultant has requested the following additional information:

#### Submitted Landscape Design

- Provision of a plan showing existing features, such as the offsite coniferous tree belt and public rights of way to provide context and a corrected north point;
- Provision of revised scrub planting and hedgerow mixes that are better informed by the local ecology;
- Provision of additional native tree planting, rather than reliance solely on scrub mix on the bunds;
- Additional tree and shrub planting within the two car parking areas (to north-east and south-west) to provide greater ecological enhancement, amenity and natural shading and provide some separation and enclosure for the car parks from the wider EfW site;
- Consideration should be given for the long-term prospects of the off-site coniferous tree belt and suitable advance tree-planting should be proposed to ensure a continuation of screening of sensitive views from the north;
- Provision of additional details of the flint walls;
- Provision of evidence of the former canal on the eastern boundary to give context for visitors;
- Provision of details of the construction of the pond and related planting;
- Provision of revised details of the routing of the nature trail path to providing more meaningful and appealing route for staff;

- Provision of details of proposals for the tear-drop shaped area of land to the north-west of the site including its landscaping, the access roads and their verges, given its close proximity to future housing within the Ford Strategic Housing Allocation site (Allocation SD8 in the Arun Local Plan 20011-2031);
- Provision of details of planting which should include climbers to the acoustic fence to enhance biodiversity and mitigate their appearance whilst the trees and shrubs are establishing;
- Provision of details of the colour and design of the security fence with a colour and design selected that minimises its visual impact. Gates required for access and maintenance should also be shown. It should also be ensured that sufficient gaps are left to allow species such as hedgehogs to pass through the fence and access the newly created habitat;
- Provision of details of the surfacing beyond the area of paving around the entrance foyer and the fill to be used in the gabions;

#### Landscape Implementation and Management Plan

- Submission of a soil survey to support the Landscape Implementation and Management Plan to ensure there is no on-site contamination or compaction and to ensure the long-term success of the landscape proposals;

#### Landscape and Visual Impact Assessment (LVIA) – Assessment Methodology

- There are a number of important and significant omissions in terms of the viewpoints and visualisations that need to be addressed. These are included as Appendices A and B below;

#### Landscape Baseline

- They advise that insufficient consideration has been given in the landscape baseline to recreational value or perceptual qualities (including openness and tranquillity) and the long views to the South Downs which are a highly distinctive and very apparent due to the low-lying and flat landscape with relatively few trees. They advise that the West Sussex Landscape Character Assessment highlights key characteristics of the Chichester to Yapton Coastal Plain and the Lower Arun Valley and that a more detailed and revised examination of the landscape baseline is required. Further details are set out in the comments of The County Council's Landscape Consultant, although your attention in particular is drawn to the comments relating to; the Goodwood to Arundel Wooded Estate Downland and need to pay attention to panoramic views, for example from the viewpoint at The Trundle, in planning any change in this or adjacent areas, including areas outside the National Park boundary; and there being no consideration of the potential effects on the seascape for South Marine Plan Areas (Marine Character Area 7: Selsey Bill to Seaford Head);

#### Assessment of Landscape Effects

- Further consideration needs to be given to individual elements that comprise landscape character and to the effects on key characteristics of landscape character as defined in the West Sussex Landscape Character Assessment that a development of this scale and height could have. This should include review of the existing Landscape Character Assessments as details on the comments of the County Council's landscape consultant including further detailed surveys of the application site and its immediate setting or surroundings. This should include an analysis of the extent to which the site and its immediate surroundings conform to or are different from the wider Landscape Character Assessments that exist,

and to pick up other characteristics that may be important in considering the effects of the proposal. (GLVIA 5.16);

- Re-assessment of the Landscape effects on the site (L 1) is required;
- Re-assessment of the landscape effects on the South Downs National Park (L 13) is required;
- Consideration needs to be given to night-time landscape effects including the potential effects of plume at night, with light sources reflecting on the water droplets in vapour, and its likely contribution to eroding the rural character of the area;

#### Visual Baseline

- The grouping of viewpoints requires reconsideration. Visual receptors in Conservation Areas, that are highly sensitive, should be assessed separately rather than in combination with other less sensitive receptors;
- Further consideration needs to be given to the visual impact on the future residents of Ford Strategic Housing Allocation site, who will be living in close proximity to the site with its limited onsite screening, particularly in terms of the provision of more effective screening;
- Further consideration needs to be given the impacts on the PRoW in the immediate vicinity such as 200-3 and 363, including the provision of additional viewpoints (included in Appendices A and B below);
- Some viewpoints, for example those representing views from St Andrew's Church (Viewpoint 14), should be taken from nearer to the receptor, for example in the churchyard to the front of the church where there are some open views to the site, to give a better impression of the existing view;
- For clarity the report should include those photographs which were not able to be taken due to Covid-19 and form part of 'The Landings' submission;

#### Assessment of Visual Effects

- The magnitude of visual effects needs to be reassessed (see the comments from the Council's landscape consultant) and the missing visualisations included (see Appendices A and B below). You should also take into account the advice on the evaluation of the landscape as lacking distinctiveness in undertaking the re-assessment;
- The grouping of viewpoints needs to be re-examined and regrouped reassessed (see the comments from the Council's Landscape consultant);
- Further consideration needs to be given to the impact of the proposed built form (including the stack and plume) where it breaks the horizon, including that of the South Downs or crosses the offing (the area of the sea seen below the horizon) in views from the north;
- Further consideration needs to be given to the choice of colours of the proposed built form and how they reflect the landscape character and might lessen the visual impact;

#### Visualisations Submitted

- The Council's Landscape Consultant has advised that some of the viewpoints closest to the site, where one would expect the effects to be most noticeable are

lacking visualisations, specifically viewpoint 26 (Ford Lane) and Viewpoint 36 (Rodney Crescent). These should be provided;

- They also advise that the visualisations do not show the plume which, although potentially visible on only approximately 25% of days, would still be a noticeable feature, and would draw attention to the built-form. Additional visualisations should be provided to show the plume; and
- Of the viewpoint photographs which lack visualisations attached in Appendix B below, visualisations should be provided.

#### Appendix A

##### Supplementary viewpoints and visualisations requested

Description	Reason
Close PRoW to north and west of site (366/ 363/ 200-2 Old Canal)/ 200-3/200-4/359) which will be within The Landings	Representative of local footpaths and future residents of the Ford Strategic Housing Allocation site
Close PRoW 175 to south of site which will be within The Landings)	Representative of local footpaths and future residents of the Ford Strategic Housing Allocation site
Riverside PRoW further south than VP 14	Representative of PROW users
From western side of churchyard of St Andrew's, Ford	Representative of Church visitors and PROW
Views from sea	Representative of Marine Character Area with views to South Downs

#### Appendix B

##### Supplementary Visualisations Requested

TOR Viewpoint Number	Description	Reason
5	Poling Street	Represents mid-range views in countryside to east
6	East of Littlehampton	Represents footpath users and residents in the Arun Valley
9	Night view from Nore Folly	Day time view and visualisation requested
11	Ford Lane	Representative of close views from local roads and dwellings
13	Lyminster Conservation Area	Representative of views within Conservation Area and adjacent to Grade I listed church

16	Ford airfield	Representative of residential views on Rollaston Park new dwellings on the Ford Strategic Housing Allocation site.
17	North edge of Middleton on Sea	Representative of residential views towards South Downs.
19	SDNP PROW	Representative of views from lower slopes of SDNP to north of A27 where there is intervening woodland.
21	A259 Bognor	Representative of residents, PRoW and motorists crossing the open coastal plain
25	St Mary's Climping	Representative of views within Climping. To demonstrate potential screening effect of trees
26	Ford Lane	Representative of workers, motorists, local PRoW and residents of Atherington Ho etc.
30	North of Arundel Castle	Representative of views from Arundel Park within SDNP.
31 (Landings VP11)	Arundel Castle Keep	Representative of view from Grade I listed Arundel Castle. A key view for Arundel Castle and SDNPA
32 (Landings VP10)	West of Littlehampton	Representative of residents on the west of Littlehampton looking across the Arun valley
33 (Landings VP 8)	PROW 166 south-east of Burndell/Yapton	Representative of PROW and residents
34 (Landings VP3)	Horsemere Green	Representative of effects on local residents and motorists
36	West of Rodney Crescent	Representative of neighbouring residents and PRoW

## External Consultees

### Arun District Council

#### Environmental Health - Air Quality and Emissions (See full comments from Arun District Council Environmental Health)

Arun District Council Environmental Health request the following additional information:

- An emissions mitigation statement that includes proposed mitigation measures which should equal the health damage cost, with mitigation options designed into the development in accordance with the Standard Mitigations and Table 2 of Air Quality & Emissions Mitigation Guidance for Sussex (Sussex Air Quality Partnership (2020) available at <https://sussex-air.net/ImprovingAQ/GuidancePlanning.aspx>);

- Details of the proposed improvements for cycling and pedestrian connections in accordance with Section 3.1 of the submitted Walking, Cycling and Horse Riding Assessment Report dated June 2020 by Ramboll;
- Details of the EV charge points for staff parking and vehicles used on site;
- Geographical odour modelling in the vicinity of the site to support the conclusions of the Environmental Statement along with confirmation of the OEU levels caused from the site by the operation in the worst case scenario;
- A cumulative assessment of odour impacts the biogas digester and lagoon to the north of Ford Lane, and Besmoke on Ford Lane;
- They advise that the Acoustic Report (Technical Appendix J: Noise and Vibration Assessment) June 2020 and the ES Chapter 14 need to be amended to take account of the development right across the Ford Strategic Housing Allocation site and not just the defined R5 receptor and that it should take into account the phasing of the development and include Ford Prison as a noise sensitive receptor. They advise that greater clarity needs to be provided of effect of the phasing of development on the adjacent Ford Strategic Housing Allocation site, so that the impact, particularly of the construction phase (which will be lengthy) is fully understood. Noise contours should be provided illustrating impact of the construction phase and the operation phase on the Ford Strategic Housing Allocation site;
- Revision of the Acoustic Report to explain why the entire 24-hour period on the 9<sup>th</sup> and 10<sup>th</sup> February 2020 has been excluded from the long-term noise survey, provide definition of the “relatively short duration”; and
- Provision of amended lighting details and an assessment designed in accordance with Zones E2/E3 rather than Zones E3/E4.

**Leisure and Landscape (See full comments from Arun District Council Leisure and Landscape Officer)**

Arun District Council Leisure and Landscape team request the following additional information:

- Provision a detailed of the landscaping plan and specification demonstrating how mitigation and screening and screening in relation to existing and future residents and existing and proposed sports facilities, will be provided and how the landscape setting and biodiversity improvement and enhancement will be achieved.

**Historic England (See full comments from Historic England)**

Historic England have requested the following additional information:

- An additional Viewpoint and Visualisation from the west end of Ford Church (similar to the request from WSCC Environment and Heritage and WSCC Landscape Consultant);
- A Visualisation of Viewpoint VP25 from outside St Mary’s church, Climping and closely adjacent medieval village earthworks (similar to the request from WSCC Environment and Heritage and WSCC Landscape Consultant);
- A Visualisation of Viewpoint VP26 from Ford Lane Adjacent to Atherington House;

- A Viewpoint and Visualisation from the Conservation Areas at Yapton and Lyminster;
- Provide a Viewpoint and Visualisation from Tortington Priory; and
- Provide a Viewpoint and Visualisation VP 31, from Arundel Castle and/or from other significant high points at the top of the town e.g. from St Nicolas' Church and Arundel Cathedral.

### **South Downs National Park Authority**

The South Downs National Park Authority (SDNPA) have commented that the proposal will have substantial adverse impacts on views and experiential qualities of the National Park and its setting. It 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. This is acknowledged in the landscape and visual impact assessment.

Accordingly, a more explicit assessment of the impact on the South Downs National Park is required. As part of this the approach of creating a 'visually dynamic architectural landmark', needs to be justified and explained in this context. Further information is also requested regarding the consideration given to the mitigation measures to reduce the adverse impacts on the National Park and to how the development of the site could best harmonise the proposal with the landscape, including the use of material finishes and colours.

The detailed comments from the SDNPA suggest exploring further a reduction in the scale and height of the building(s) and stack and other measures to reduce the visual impact and giving further consideration to the use of 'green/living' walls.

### **Additional Information to be supplied (not requested under Regulation 25)**

In addition to the information detailed above, the County Council also requests that the following points are addressed;

- You will be aware from our recent discussions following the initial round of consultation that the application has raised significant concerns about the scale, bulk and height of the building(s) and stack and of the need for additional measures to reduce the visual impact (as is reflected in the comments of consultees set out above). We would therefore strongly advise that further consideration is given to this matter, including consideration of the overall design, with a view to minimising the height of the buildings and further mitigation achievable through the choice of colour and materials palette and extended landscaping provision (see our further comments below). This should include an explanation/demonstration that the buildings cannot be constructed below the existing ground level and alternative technology options which may enable a lower and/or smaller buildings to be designed;
- You will see from the consultation responses that there have been a number of concerns, and in some cases disagreement, with the conclusions of the Environmental Statement and supporting technical appendices. This is particularly the case in relation to the landscape and visual impact assessment and impacts on heritage. We would therefore advise that you review, amend as necessary and update the assessments in the light of the preparation and submission of the additional information listed above;
- With regard to the exterior design of the proposed buildings we would recommend that you submit an updated Design and Access Statement, particularly with regard to the final form and appearance of the development. This should demonstrate that the design has taken into account issues raised by consultees and that the opportunities that have been considered to deliver a



building that contributes positively to the character and quality of the area and promotes community acceptance of waste facilities through high quality design. This should include an explanation of why the plant has to be the size proposed, and whether a smaller capacity facility could not deliver any substantive reduction in the buildings height and scale;

- In addition to the details requested by the Council's Tree Officer, as set out above, other planting opportunities for landscaping and tree planting that have been considered, both on and off-site, should be identified. The relationship with the Ford Strategic Housing Allocation site will be particularly critical, as well as the impact on the nearby heritage assets and public rights of way, particularly to the north-west, north and east of the site;
- Clarity is requested on what, if any, landscaping provision is proposed to the northern boundary of the site and the teardrop shaped area to the northwest. This should identify what is proposed in relation to existing conifers, what if any screening at a lower level would be provided along this boundary, and how this would be maximised. Because the proximity of the Public Rights of Way network, this is an important issue in relation to public access to the area immediately around the site to the north;
- In the light of any review, amendment and updating of the assessments we would also advise that you provide an updated appraisal of how the development is seen to accord with the individual 'development principles' for the 'Site north of Wastewater Treatment Works, Ford', a requirement (W10) of the West Sussex Waste Local Plan (April 2014), Policy W10, where necessary, drawing evidence from the Environmental Statement;
- As has been raised by Arun District Council and the neighbouring developer, because of the constraints of the site and the concurrent proposals for the development on the the Ford Strategic Housing Allocation site, it is important that the applicants and the developer of the adjacent site seek to cooperate to produce proposals that work together, and incorporate adequate mitigation across the two schemes. This is required to ensure compatible development which both safeguards the amenity not only of future residents of the the Ford Strategic Housing Allocation site, on the one hand, but also the business, schools and other mixed uses proposed, and the operation of the energy recovery facility and waste sorting and transfer facility, on the other. The provision of noise, odour and lighting contours and mapping of sun light/overshadowing on the the Ford Strategic Housing Allocation site needs to be explicitly addressed, showing which, if any areas of the allocation would be affected or the use of which would be sterilised. The County Council appreciates the applicants cannot require the developer for the Ford Strategic Housing Allocation site to co-operate, but nonetheless continued communication is encouraged to ensure that where necessary suitable separation buffers and/or mitigation are investigated and clearly identified;
- Can you also please provide details of the following specific issues:
  - Confirm if there is a need for a minimum volume of residual waste to be stored on site to allow continuous generation of electricity and how is this managed?
  - Provide an updated assessment of need and the sources of waste to be managed, taking into account the latest West Sussex Joint Minerals Local Plan and Waste Local Plan: Monitoring Report 2018/19;
  - Provide an assessment of the impacts on amenity for properties and highway footpath users along the route of HGVs in the light of the changes as a result of use of larger HGVs now proposed. This point does not appear to have been addressed or is not apparent in the submitted noise and vibration assessment; and

- Give consideration to the risk of major accidents which has been raised as an issue by a number of consultees and third parties. Can you therefore please provide an assessment of potential accident risks and how these will be managed; and
- In addition to specific consultation responses referred to above, the applicants are encouraged to review all consultation responses and third party representations received in respect of the planning application (available on the WSCC website) and provide responses to the key issues raised.

Where the further information sought would require amended plans, they should be allocated a new 'revision' number and any plans to be superseded should be identified. It is also advised that the information should be presented in a single supplementary submission.

As you are aware, under the terms of a Planning Performance Agreement (PPA) it was originally envisaged that the application would be determined by January 2021. In view of the above request for further information and on the understanding the applicant will require additional time to consider how to respond to the consultation and third party responses to date, there is a need to extend the timescale for determination.

We would be grateful for your confirmation of the likely timescale necessary to allow the applicant to respond to the above request and comments received from third parties/consultees, in order that an extended target determination date can be agreed, and PPA timetable reconsidered. Can you therefore please confirm you anticipated timescale for the submission of the additional information by no later than 30<sup>th</sup> November 2020.

If you require any further clarification or if you wish to discuss the information requested, please feel free to contact me.

Yours sincerely

*Andrew Sierakowski*

Andrew Sierakowski  
Consultant Planner  
County Planning

Enc. Consultee Responses

## **Appendix 2**

### **WSCC Selected Statutory Consultee Responses**

## WEST SUSSEX COUNTY COUNCIL CONSULTATION

<b>TO:</b>	West Sussex County Council FAO: Andrew Sierakowski
<b>FROM:</b>	Stephen Gee WSCC - Highways Authority
<b>DATE:</b>	11 August 2020
<b>LOCATION:</b>	Ford Circular Technology Park, Ford Road, Ford, Arundel BN18 0XL
<b>SUBJECT:</b>	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.
<b>DATE OF SITE VISIT:</b>	n/a
<b>RECOMMENDATION:</b>	Further Information
<b>S106 CONTRIBUTION TOTAL:</b>	-

### Background

The site is located to the west of Ford Road and south of Ford Lane, Ford and currently benefits from two planning permissions the first for a waste transfer facility and a second app ref: WSCC/027/18/F for a link road (Southern Link Road) that allows a total of 240 two-way HGV movements per day (120 in and 120 out).

Pre application correspondence took place with the applicant's highway consultants in March 2020 and comments were also provided on the Environmental Impact Assessment.

### Access

The proposed development would utilise the existing access onto Ford Road, the access provides a 8m carriageway with a footway running alongside the link into the site from the service road.

As per the pre application advice, the development would result in an increase of 50+ vehicles and as such in line with the WSCC Safety Audit policy a stage 1 audit is required to be undertaken, if necessary a designers response in line with Appendix F of GG119 should be provided.

### Sustainable Transport

A Walking, Cycling and Horse-Riding Assessment Report (WCHAR) has been produced and details a number of footpaths to the north of the site that provide connections towards Yapton, Ford Road and Ford Lane. There are no dedicated cycling facilities within the study area however Ford Road and Church Lane have speed limits of 40mph. The section of Church Lane south of Horsemere Green Lane is identified as part of the south coast cycle route and signed as such however there are no dedicated cycling facilities.

The WCHAR concludes there are limited opportunities for the development to improve pedestrian and cycle access but could support wider opportunities to:

- Explore dedicated/ shared cycleway between the site and Ford Rail station and/or A259;
- Consideration of viability of connection between the site and Rollaston Park/Yapton Road. Noting there maybe some land ownership constraints and conflicts with 'The Landings' (F/4/20) application; and
- Improved provision of pedestrian/cyclist facilities from the site to Ford Road.

The applicant should provide information on how they would support the opportunities identified.

### Trip Generation

Trip Generation has been based upon assuming all staff travel by single occupancy vehicles, LGV trips based upon a similar Energy from Waste facility run by the applicant and HGV trips in line with the maximum number imposed by the conditions of the extant planning permissions.

The trip generation of the site for a normal day has been calculated as 442 two-way vehicle daily movements (221 in and 221 out) of which 25 two-way trips take place in the AM network peak and 30 two-way trips in the PM network peak.

The peak day trips have been calculated as 465 two-way vehicle daily movements (232 in and 233 out) of which 25 two-way trips are in the AM network peak and 32 two-way trips in the PM network peak (19 AM peak HGV trips and 5 PM peak HGV trips.) As identified within the pre application advice, the shift patterns avoid the network peaks and a such a condition restricting the changeover to avoid the peak hours would be recommended.

The increase in trips compared to that previously considered in WSCC/027/18/F is shown below.

(HGVS in brackets)	Approved	This Application	Difference
Daily Total	334 (240)	465 (240)	131(0)
AM Peak	17 (17)	25 (19)	8 (2)
PM Peak	25 (17)	32 (5)	7 (-12)

### Trip Distribution / Assignment

Trips for staff and LGV trips have been distributed according to census journey to work data (10% north and 90% south) and HGV trips 100% to the south according to the existing HGV routing.

This equates to 24 daily two trips Northbound and 418 two way trips southbound in the normal operation scenario<sup>1</sup> and 100 daily two trips northbound and 1064 southbound during the peak construction phase (Month 35).

### Junction Modelling

#### Site Access

The application has provided junction modelling submitted within the Ford Airfield Transport Assessment (Arun ref: F/4/20) - Which details that the junction would work well within capacity in the peak periods. The application (F/4/20) includes all consented

<sup>1</sup> Table 5.16 of the TA provides peak operational trips which appears to incorrectly apply the normal day trip assignments instead of peak day trips

developments and local plan allocations and as such the application has provided information that considers the cumulative impact and would not result in a severe impact on the junction once operational.

A sensitivity test is requested to assess the impact of the construction vehicles of phase 3 and the Ford Market proposals currently being assessed under app ref F/5/20 by Arun District Council.

#### A259/Church Lane

The development is anticipated to generate 24 AM and 29 PM peak trips through the junction in the peak period during operation and as such the level of trips generated would not result in a severe impact on the junction. The junction is identified for improvements within the Arun Local Plan Transport and a larger mitigation scheme has been secured via CM/1/17/OUT.

Whilst no formal assessment of the development impacts were requested at pre application stage, the level of construction vehicles had not been presented and as such further information should be provided on the impact of the development during the construction phase peak period and network peak should the improvements not be implemented at the time of construction.

#### HGV flows

The predicted HGV flows would remain under the maximum daily limit set by the existing condition and as such the impact of the flows on the local network has been reviewed and accepted in principle.

Whilst the level of HGV flows may increase of what the site currently produces and decrease the perception of safety of Non-Motorised Users of Ford Road and Church Lane the levels would operate within the approved limit of application ref WSCC/027/18/F and as such would not result in a safety concern for the highway authority.

A monitoring regime of the HGV traffic would be secured via condition or inclusion within S106 agreement of the Delivery and Servicing Plan.

#### Personal Injury Accidents

Personal Injury Accident (PIA) information has been supplied within the application which shows no PIA have occurred at the site access. No PIA involving NMU along the links of Ford Road and Church Lane south of the site access have been recorded.

A total of 11 PIA have occurred at the A259/Church Lane Rbt since 2015 including 7 involving cyclists, however I would note cycle facilities at the junction have been upgraded as part of the A259 Bognor to Littlehampton cycle route improvements. Further improvements to the junction have also been secured via CM/1/17/OUT (if implemented) to include off road cycle routes and a signalised crossing across the A259 west of the junction.

#### Delivery and Servicing Plan

A plan to monitor HGV movements along the SLR and HGV movements external to the site adhere to the operational HGV route has been provided with the application. The plan and measures will be monitored by a Travel Plan Coordinator. A yellow and red card disciplinary system would apply to staff and third parties who do not follow the delivery and service plan.

#### Construction and Environmental Management Plan (CEMP)

It is noted that the Transport Assessment and CEMP construction trips do not align with the CEMP assuming single occupancy vehicle trips for construction staff of 1 person per

vehicle and the TA of 1.5. The use of differing figures does not raise any additional concerns for the Highway Authority.

The construction phase peak is anticipated to result in a total of 1164 two way daily trips (582 in and 582 out) (based on the higher CEMP figures) The number of HGV trips would remain below the consented 240 daily movements.

A total of 119 two way trips are anticipated in the AM network peak and 104 two way trips in the PM network peak. Significant flows are also expected in the shoulder peak periods of 224 two way trips between 7-8AM and 228 two way trips between 4-5pm.

The CEMP provided details the following peak

	Details	Duration	Peak Month Daily flow	Average Daily flow
Phase 1	Demolition of the westernmost existing building, construction of the northern half of the WSTF and any feasible enabling works for the southern half of the WSTF	10 months	56 two-way vehicle movements	31
Phase 2	Demolition of the remaining existing buildings including the existing WTS	3 Months	22 two-way vehicle movements	20
Phase 3	Construction and commission of the ERF	36 Months	722 two-way vehicle movements	Approx. 400 <sup>2</sup>
Phase 4	Construction of the southern half of the WSTF	12 Months	68	44

In addition to the above the CEMP details the existing WTS or proposed new WSTF would be operational throughout the construction period with an average generation of 72 two way trips.

Whilst it is acknowledged that the peak impact of construction would be limited in duration further consideration should be provided of its impact on the shoulder peaks (would these become the new peak periods?) and its impact on the A259/Church Lane junction.

A Construction Traffic Management Plan would be a necessary pre commencement condition. Whilst not a formal consideration within the application, the peak construction period should not align with the implementation of improvements to the A259/Church Lane roundabout associated with planning application ref CM/1/17/OUT further consideration of this would take place during the booking of roadspace with the streetworks team should the applications be approved and implemented.

#### Parking

The development proposes a total of 133 car parking spaces and 2 minibus/1 coach spaces. The level of parking has been calculated to provide sufficient capacity at the shift turn over time. 100% of the staff and visitor parking spaces will be electric charging enabled.

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<sup>2</sup> Estimated from Figure 10 of Outline CEMP

64 covered and secure cycle parking spaces in the form of Sheffield stands would also be provided.

A total of 10 HGV and 28 Refuse collection vehicles (+5 temporary bays next to the workshop) would also be provided.

#### Travel Plan

A workplace travel plan would be required to be secured via condition.

#### Conclusion

Further Information is requested:

- Safety Audit (and if applicable Designers Response)
- Figures relating to phase 3 construction vehicles
- Site access modelling sensitivity test of Ford market proposals and peak network and shoulder peak of Construction Phase 3.
- A259/Church Lane modelling of Construction Phase 3 peak and shoulder peak prior to implementation of junction improvements.
- Consideration of WCHAR conclusions.

**Stephen Gee**  
**West Sussex County Council – Planning Services**



## WEST SUSSEX COUNTY COUNCIL – PLANNING SERVICES

### Environment & Heritage Team – Response to consultation by County Planning

#### ARCHAEOLOGY comments

To: - [planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)

FAO: - Andrew Sierakowski, County Planning

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**DATE:** 21<sup>st</sup> August 2020

**Consultation date:** 20<sup>th</sup> July 2020

**REF.:** WSCC/036/20

**LOCATION:** Ford Circular Technology Park, Ford Road, Arundel BN18 0XL

**PROPOSAL:** 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.

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#### RECOMMENDATIONS:

Objection is raised to the proposals on the grounds of the their major adverse impact upon the settings of the Grade II Listed Buildings to the south of Ford Lane and St Andrew's Church, causing substantial harm to and loss of significance of those heritage assets.

Policies: National Planning Policy Framework, paragraph 195; Adopted Arun Local Plan 2018, Policy HER DM1 (Listed Buildings) (e).

#### COMMENTS:

The following comments address archaeological (including historic landscape) and built heritage considerations. The West Sussex Historic Environment Record (WSHER) database has been consulted (internal search, 3<sup>rd</sup> August 2020).

Archaeological and built heritage considerations relevant to this application are presented in Chapter 10 (Cultural Heritage) of the Environmental Statement (ES).

#### Built Heritage

##### *Former Ford military airfield structures*

The existing former aircraft hangars 1 and 2 (type B1 aircraft sheds) on the site were built in 1948-51 for the post-war military airfield; in 1946 their site was occupied by part of the RAF aircraft dispersal area and a workshop. It is stated in the ES (10.69) that they are "of a standard and common building type, have been extensively altered and are in

the greatly changed setting of the partly redeveloped airfield". For these reasons they have been assessed as of "low-negligible importance".

This is a reasonable assessment of the hangars' present significance in a national context. An additional consideration is that they lack a direct connection with the internationally important and locally memorable events of World War II. No objection on archaeological grounds is raised to their demolition, subject to an adequate historic building archaeological record (photographic, with drawn sections, concise written description and historical context).

*Scheme effects on designated heritage assets: visual impacts on settings*

Numerous heritage assets are included within the Zone of Theoretical Visibility (ZTV) of the proposals. The observations below focus on the effects of the proposals on designated heritage assets within 1 km of the site and on Arundel, because of its elevated location on the edge of the South Downs, and the concentration at the highest point of the town of Arundel Castle, Arundel Park, Arundel Cathedral and St Nicholas' Church, respectively a Scheduled Monument and Grade I Listed Building, a Grade II\* Registered Park/ Garden, and Grade I Listed Buildings.

1. General: the coastal plain

On the crest of Halnaker Hill (Viewpoint and Visualisation 18) is a Scheduled Monument - a Neolithic causewayed enclosure - and the locally well-known Grade II Listed Halnaker Windmill'

The Ford site is too far from these (9.5 km) to have anything but a low visual impact on the settings of these two heritage assets, but the Visualisation provides a good impression of the prominence they would have as unusually tall structures upon the coastal plain. Comparably tall structures within this visual envelope are few: Chichester Cathedral, the Littlehampton Gas Holder, and high-rise buildings in Littlehampton and Bognor Regis. Because of their height and bulk, the new buildings will be in view of heritage assets over a wide area of the coastal plain.

2. Atherington House, Ford Place, Southdown House, The Lodge, Ford Lane

Close to the site (245 metres), Viewpoint VP26 is taken from the roadside on Ford Lane, adjacent to the Grade II Listed Atherington House, Ford Place and Southdown House, a late 17<sup>th</sup>-/ 18<sup>th</sup>-century building, subdivided. They belong to a distinctive building style of the period, the "Artisan Mannerist", and before subdivision were used as the farmhouse of one of the larger farms in Ford Parish, Ford Place Farm.

The buildings' local significance lies in their building style, their historical setting essentially rural/ agricultural, as a farmhouse on a narrow country lane, amidst arable fields. In the 19<sup>th</sup> century a rural canal operated in the background, and in the mid- 20<sup>th</sup>-century a military airfield.

A visualisation has not been provided. The eastern end of Hangar 2 of the former military airfield is visible in Viewpoint VP26, on the far side of an arable field (lying outside The Landings strategic development area), and at the edge of views from the upper storey of the Listed Buildings (from WSCC visit to VP26, 13/8/20). Hangar 1 and the remainder of Hangar 2 are almost wholly screened behind the line of tall trees on the north side of the footpath running along and outside the northern site boundary.

The height of the existing former hangars would be considerably overtopped by the new buildings. Owing to their height and monolithic massing, the new buildings would constitute a considerable new visual intrusion into the existing setting of the Listed

Buildings, which remains largely rural/ agricultural, and a significant new adverse visual impact upon that setting.

Because of their height, mass and proximity to the Listed Buildings, filling the skyline in southerly views from the Listed Buildings, mitigation of this impact does not appear to be feasible. A permanent adverse effect, through loss of significance of the Listed Buildings' largely rural/ agricultural setting, would result.

The submitted Sun Path Study for the Winter Solstice indicates that long winter shadows cast by the new buildings during the late afternoon would place the Grade II Listed Buildings in shadow, another permanent visual change to the Listed Buildings' settings, although temporary each year. However the existing shadowing effect at this throughout the year upon the Listed Buildings of the tall trees in the hedgerow running southwards from the Listed Buildings towards Hangar 2 should be taken into account as well, so as to isolate for the purposes of visual impact assessment any shadowing effect exclusive to the new buildings.

### 3. St Andrew's church, Ford

St Andrew's church, Ford, is a Grade I Listed Building, and therefore a designated heritage asset "of the highest significance" (National Planning Policy Framework (NPPF), February 2019, para. 194 (b)).

In the medieval period, contemporary with the church, it stood at the east end of a very small village, bounded on the south by a lane from Ford Road and on the west by Ford Road itself. The village became deserted in the 1500s, possibly due to regular flooding. Part of the village site was later cut through during construction of the Portsmouth-Arundel Canal, now filled in. The present open surroundings of the church, constituting its setting, reflect the desertion of the settlement which led to the isolation of the church; and so are integral to understanding of the history both of the church and Ford village.

It has been stated fairly in the ES that the existing setting of the church is extensive and open, and that Ford Road, HM Prison, Ford, Rodney Crescent, the houses at the end of Ford Lane and the existing hangars and industrial development on Ford Airfield to the rear constitute a visual and aural (i.e. noise-related) separation or edge to the setting of the church (ES, 10.105).

Viewpoint and Visualisation VP14 are located on the bank of the River Arun, 260 metres behind the western elevation of the church, nearest the proposal site. An additional viewpoint and visualisation from the west end of the church were requested by the County Council in pre-application consultation about viewpoints (April 2020), but have not been taken owing to the then current Covid-19 lockdown movement restrictions (ES, 10.24).

In photographs taken by WSCC in January 2020 from the west end of the churchyard at Ford, the existing hangars in the application area are visible from Ford church, 700 metres distant, but are not prominent, appearing between the houses of Rodney Place and no higher than the tops of the roof- and adjacent tree-lines.

Referring to the more distant Viewpoint and Visualisation VP14, the new buildings would be visible from that viewpoint at twice the height of the existing roof- and tree-lines, the stack higher still. From the western end of the church, the new buildings will appear higher and more prominent, with correspondingly greater effects upon the setting of the church.

The height and monolithic mass of the new buildings would constitute a major new intrusion into the visual envelope of the church. In view of the national “highest significance” of the church, and the historical significance of its open and still very largely rural setting, the new buildings would constitute a permanent adverse impact upon that setting and loss of significance to that heritage asset.

#### 4. St Mary’s church, Climping and closely adjacent medieval village earthworks

St. Mary’s church, Climping (Grade I Listed Building) is located 0.95 km south-east of the site. Earthworks of the shrunken medieval village of Climping, parts of a Scheduled Monument, are located nearby, to the south and east.

Viewpoint VP25 from outside the church shows a few small trees in the foreground of the line of sight from church to site, but without a Visualisation (requested April 2020 during pre-application advice), it is not possible to assess whether the upper parts of the new buildings and stack would be visible from the church, and how prominent they would be within the settings of the church and Scheduled Monument.

In view of the proximity of the church and monument to the site, and their highest significance as heritage assets, provision of a Visualisation from Viewpoint VP25, , requested at the Scoping stage of this application, is essential for reliable assessment of the effects of the proposals upon the assets’ settings. Without that Visualisation, this application cannot be supported.

#### 5. Arundel

Viewpoint and Visualisation 4, taken from the A27 Arundel Bypass 3.95 km from the site, upon the coastal plain, show the new buildings at a point east of the flood plain of the River Arun. The buildings show as an intrusion into the view southwards from Arundel towards the coast, an important historical connection for Arundel as a historic town, because of its former status as a medieval port. At this low level, the buildings are noticeable, despite their distance from the town, but do not impinge upon that view in such a way as to cause major harm to the significance of the town’s setting.

Viewpoint and Visualisation VP 31, from Arundel Castle, are not illustrated. Viewpoint and Visualisation 29, taken from the top of Arundel Roman Catholic Cemetery, near the top of the town, are not useful for assessment of the views from the highest point of Arundel, where Arundel Castle, St Nicholas’ church, and Arundel Cathedral are situated on the ridge line, because of a tree in the immediate foreground.

Because of the urban topography of Arundel (downhill streets orientated north-north-west – south-south-east), it is not clear that southward views from the Cathedral and St Nicholas’ church at ground level would include the site, nor, because of surrounding planting, from within the grounds of Arundel Castle. From within the Castle at higher level, the site is likely to be more visible. Because of the significance of the view from Arundel Castle, as a heritage asset of the highest significance, more information is needed, in the way of views from the Castle, to enable assessment of the impact of the proposals upon the Castle’s setting.

#### 6. Yapton Conservation Area

In Viewpoint and Visualisation VP24, taken from a Public Right of Way to the north of Yapton Conservation Area, the new buildings and stack are prominently seen, almost four times the height of the intervening hedge and tree lines.

St Mary's church, Yapton (Grade I Listed Building), Church Farm House and Church Farm Mews, in that part of the Conservation Area nearest the application site, are well screened to the east by walls (the church) and tree lines.

Church Cottages and Crispin's Cottage, within the Conservation Area on the west side of Church Lane have views eastwards, with Church Farm and a tree line still further east. The existing hangars are not visible in the current view (site visit) but the upper part of the new buildings and stack may be at 1.25 km distance. Viewpoint 35, located immediately west of the churchyard, does not allow assessment of the effects of the proposals upon this part of the Conservation Area.

#### 7. Tortington Priory

Tortington Priory, comprising the remains of a 12<sup>th</sup>-century Augustinian priory, is a Scheduled Monument, situated 2.5 km north of the site. The Priory is well screened by mature trees on its southern and south-western boundaries.

No Viewpoint or Visualisation is available from the site, but referring to the perceived height of the new buildings and stack in Viewpoint and Visualisation 28, 800 metres to the south-west and so much nearer the site, the new buildings and stack would be unlikely to be visible through the screen of trees around the Priory.

#### 8. New Place, Ford Lane

Trees, walls and low buildings intervene in the view between the Grade II Listed New Place, on the north side of Ford Lane, and the site. At 540 metres' distance, it is possible that the uppermost parts and stack of the new buildings may be visible from upper storey windows.

### Archaeology

#### *Below-ground archaeological features and deposits*

The known below-ground archaeology and historical development of the site are fairly set out in Chapter 10 of the ES.

Known below-ground archaeological remains include a 300-metre long section of the early 19<sup>th</sup>-century Portsmouth to Arundel canal, infilled and buried below the former Ford Airfield, and remaining traces of part of the removed and built-over aircraft dispersal area of the World War II period airfield, comprising concrete slipways, a workshop and other small buildings.

There have been several previous archaeological intrusive and non-intrusive archaeological investigations on the former airfield that attest to the extent of earlier archaeology on the Airfield, from the Bronze Age to Roman periods. Areas of archaeological features of Iron Age and Roman settlement, recorded to the south in 1999 in advance of construction of the Ford Wastewater Treatment Works, extended northwards outside the Works, possibly as far as the current application area.

#### *West Sussex Waste Local Plan – site-specific archaeological policies*

The West Sussex Waste Local Plan (WLP), recently reviewed, includes the site as a Built Waste Management Facility allocation (WLP, 7.3.8). The Development Principles include provision (7.3.9) to the effect that if substantial new ground excavations are proposed, low-level archaeological mitigation (will be) required.

The term “low-level archaeological mitigation” is not defined, but is interpreted here to involve archaeological features and deposits, below- and above-ground. It is considered not to require preservation of such features and deposits intact (reserving for discussion with the applicant, if planning permission is granted, the unexpected discovery of nationally significant archaeological remains).

This mitigation is considered to include the preservation “by record” of archaeological features and deposits, including industrial archaeological features such as the buried canal, and former military historic buildings such as Hangars 1 and 2.

Preservation “by record” would involve on-site investigation and recording and subsequent off-site analysis and reporting, and public access to historical and archaeological information about the findings of the investigation and recording.

#### *The Portsmouth to Arundel Canal*

During its operation in the early 19<sup>th</sup> century, the Portsmouth to Arundel canal was a significant feature of the landscape and transport infrastructure of West Sussex. Parts of the Canal and its infrastructure (bridges) survive almost intact, albeit now normally dry; elsewhere it has been infilled and built over.

The buried section of the canal within the site is not specifically referred to in the WLP. Archaeological investigation and recording of buried remains of the canal, where it would be adversely affected by development, should form part of the mitigation alluded to in the WLP, together with these landscaping proposals relevant to the line of the canal.

It should be noted that as regards the canal, through several iterations of their Local Plan, Arun District Council have favoured a development principle of preserving the line of the canal. Well-preserved visible sections of the canal, not infilled and grassed-over, are allocated as green space (Arun District Local Plan (ADLP) Policies Map), and ADLP Policy HER DM5 requires that development will be permitted where it would not adversely affect the remaining line and configuration of the Portsmouth and Arundel Canal and features along it.

At Ford Airfield, where the canal is buried and not visible, ADLP Strategic Development Site SD8 (Ford) development principles require development to “Reflect the historic alignment of the canal” (Policy H SP2c (Housing Delivery) SD8 (Ford) (h)). On the illustrative masterplan of “The Landings”, Ford development proposal for Site SD8 (Arun District Council planning application F/4/20), a green space corridor is proposed within this very large site, broadly along the line of and commemorating the buried canal, on the western edge of the former Ford Airfield.

In the current waste related planning application, in the context of the limited space available for redevelopment, it has not been proposed to leave the line of the canal undeveloped. Most of the line of the canal within then site would be built over or cut through by underground drainage structures.

In terms of canal related mitigation, two breaks in the planting of the western and eastern boundaries of the site have been proposed, overlying the line of the canal and marking its course at these two points, with information to be provided on site about the history of the canal.

#### *Archaeological survival and scheme impact*

It is noted reasonably in the ES (10.87) that “the site area has suffered from earthwork clearance and construction of airfield and extant buildings on site” and that damage to archaeological horizons is unquantifiable. Much of the buried canal structure is likely to

survive below the existing concrete rafts and buildings, and (if present) Iron Age and Roman archaeological features may survive, possibly truncated (uppermost parts reduced/removed), in between areas of deeper 19<sup>th</sup>-century and modern disturbance for construction of the canal and airfield-related former slipways, tanks, bunkers, and building foundations.

Within the footprint of the proposed bunker for the energy recovery facility (ERF), deep excavations for new construction are likely to cut through and remove the northern edge of the buried and infilled canal structure entirely, and any shallower, more ancient archaeological features outside the canal. The underground drainage structures are not expected to cut as deeply into the infilled canal, but would cut through its full width.

Beyond the bunker and underground drainage structures, assessment of the below-ground archaeological impact of other new build is difficult, in the absence of details of the construction methods to be used. The submitted documents state that foundations of existing buildings, once demolished, are not to be grubbed out below ground level; that existing concrete standings will be used as foundations in some cases; and that heavy plant expected to be present during construction may or will include piling rigs. These statements imply a preference for retaining where possible the existing concrete hard standing, and an expected need for piling. For the purposes of these comments, both piled foundation and trench foundation construction methods for the new buildings will be considered.

Trench foundations would cut through the canal infill, probably to its full depth. The infill will be mid-20<sup>th</sup> century, and expected to be of negligible archaeological value, but the structure of the sides and floor of the canal is expected to have been lined with puddled clay for water retention, is of archaeological interest, and would also be removed. An accommodation bridge crossed the canal, when the latter was in use, its eastern edge within the footprint of the new Waste Sorting and Transfer Facility building (WSTF). The bridge abutments may survive below ground level, and are also of archaeological interest. Trench foundations would also remove locally earlier buried archaeological features.

In general terms, piled foundations, as a series of point impacts rather than the linear impacts of trench foundations, would remove less of the structure of the canal, canal bridge and archaeological features. However a dense piling pattern may still bring about considerable archaeological disruption.

Driven (hammered/ vibrated) piling can cause much distortion of archaeological layers and damage to fragile artefacts such as prehistoric or Roman pottery. Drilled piles would involve a lesser footprint of disturbance at depth. In all cases, any earthworks for construction of a piling mat, excavations for pile caps and ring-beams may reduce the uppermost parts of archaeological features and structures, and to a greater depth if excavations to create them are begun from a level beneath the concrete raft.

To conclude this section, excavations for construction of the ERF bunker, underground drainage structures, and new building foundations will remove buried archaeology. Buried archaeological features are not expected to be of national importance; the impact of both trench foundations for the new buildings and a drilled-pile foundation design is preferred in that it would cause less disruption to surviving ancient archaeological features and to the buried structure of the canal and canal bridge.

The scope of necessary archaeological investigation and recording (as mitigation) will need to be defined in relation to the density of piling, earthworks and other excavations.

John Mills

County Archaeologist  
Planning Services  
West Sussex County Council

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## WEST SUSSEX COUNTY COUNCIL CONSULTATION

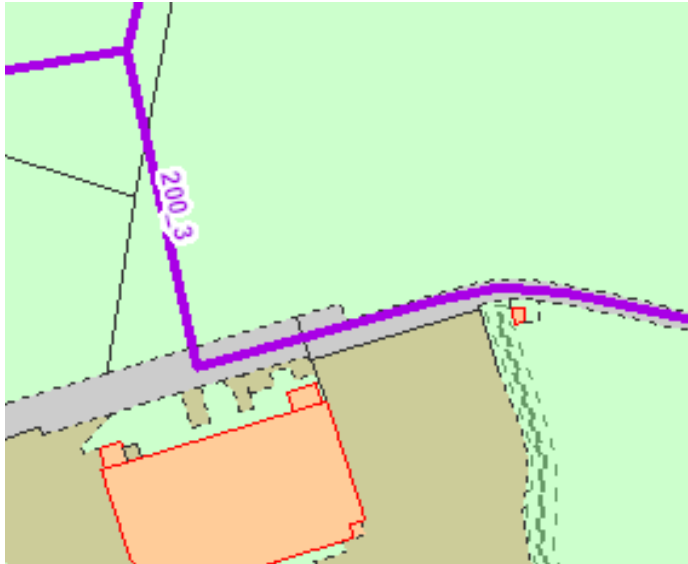
<b>TO:</b>	West Sussex County Council FAO:Chris Bartlett
<b>FROM:</b>	WSSC - Highways Authority (Public Rights of Way)
<b>DATE:</b>	24 July 2020
<b>LOCATION:</b>	Ford Circular Technology Park, Ford Road, Ford, Arundel BN18 0XL
<b>SUBJECT:</b>	WSSC/036/20 Demolition of existing buildings and structures 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.
<b>DATE OF SITE VISIT:</b>	24/07/20
<b>RECOMMENDATION:</b>	Objection
<b>S106 CONTRIBUTION TOTAL:</b>	n/a / £ See below for breakdown.

The existence of a Public Right of Way (PROW Footpath 200\_3) is a material consideration. Should planning consent be granted, the impact of development upon the public use, enjoyment and amenity of the PROW must be considered by the planning authority.

Having reviewed the information supplied, it is unclear how the existing PROW is to be accommodated. A holding objection is hereby lodged pending receipt of further information once supplied, the application will be reviewed again and a formal response provided.

The design and access statement states no PROW fall within the site however this conflicts with the plan and definitive line of Footpath 200\_3 which intersects the site in the North East corner. According to the plan an access road, also Public Right of Way Footpath 200\_3 is obstructed by a bund/vegetation just West of the gas governor which can be seen in the site photo. This access road continues, carrying PROW Footpath 200\_3 before turning North out of the site.

It should also be noted that the Public Footpath extends the entire width of the access road as shown below.



Footpath 2003\_3 View West from Gas Governor (NE corner of site)



Line of Footpath 200\_3 heading West before turning North.



**Darryl Hobden**  
Public Rights of Way



## **WSCC TREE OFFICER response to planning consultation**

**Application reference number:** WSCC/036/20

**Location:** Ford Circular Technology Park, Ford Road, Ford, Arundel BN18 0XL

**Proposal:** 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

**District:** Arun

**Date:** 5<sup>th</sup> August 2020

**Summary response:** no objection subject to appropriately worded conditions to secure tree protection and a full, detailed landscape specification.

**Response:** The site benefits from some limited existing planting on the northern and eastern boundaries. Although this is shown outside the red line boundary, opportunities should be explored to supplement and reinforce this planting, especially where gaps exist.

Looking at the site within the context of the wider landscape, opportunities should be explored to improve the linear habitat connectivity by planting up gaps in hedgerows / shelterbelts where possible, e.g. the gap to the north east of the site along the access track from Rodney Crescent, which is also PROW 200\_3.

The site is extremely constrained, so there are limited opportunities for 'landform screening, landscape planting and biodiversity improvements'; hence the need to look beyond the site boundaries for additional landscape enhancements, if possible, to 'integrate the proposal with the adjacent landscape', as advised at the second pre-application meeting.

The arboricultural impact assessment (AIA) has identified Group 10, the poplars along the access road, to have <10 years remaining contribution and categorised them as 'U', so planned replacement of these should be incorporated into future landscape plans to ensure the screening they provide is continued.

The conservation grassland proposed on the northern boundary could be heavily shaded by Group 1 conifers (and the acoustic fence) unless the access track is to be retained between these and the new planting.

Smaller tree stock should be used – it is likely to establish more successfully, assuming the maintenance and aftercare is thorough – 10-12cmg instead of 20-25cmg. This will also avoid the need for ground anchors, but some low above ground staking will be required.

**Species mixes:** scrub planting – omit alder buckthorn (which does not occur locally) replace with field maple (*Acer campestre*); omit silver birch and replace with goat willow (*Salix caprea*).

**Hedgerow** – hawthorn (*Crataegus monogyna*) should be 60% of the mix and field maple 20% instead of blackthorn. Omit *Clematis vitalba* (which will appear over time naturally) and replace with 5% blackthorn.

Planting along the southern boundary is challenging because of the very narrow area, additionally constrained by two fences; an inner 3m high timber acoustic fence and an outer 2.4m high security fence. Enough light should be available for the grassland to establish, but may be difficult to maintain. Given time, the proposed oaks may clear the fencing and branches can then grow over both, but they could be constrained / distorted by the fencing with branches growing through the outer fence. Security would also potentially be compromised if it was possible (well into the future) to climb the trees and gain access to the site that way. The oaks are also shown planted very close together – each must have sufficient space to develop to their full potential. Smaller stock should be planted which is likely to establish more successfully.

A full, detailed planting specification is required together with details of suppliers; prior approval is required, particularly for biosecurity reasons. Tree guards, shelters and fixings should be biodegradable.

Ash (*Fraxinus excelsior*) cannot be planted due to the prevalence of ash dieback.

There must be full compliance with, and implementation of, the tree protection measures and mitigation detailed within the AIA. As noted, bespoke method statements may be required in future for any additional works that could impact on existing trees / shrubs, e.g. CHP pipeline.

A comprehensive Landscape and Ecological Management Plan (LEMP) should incorporate and add to the submitted landscape management plan.

I cannot comment on the submitted LVIA.

[Julie Bolton](#) | County Arboriculturist, Environment & Heritage Team, Planning Services,  
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Landscape Architect Response to Planning Application

**Town and Country Planning Act 1990**  
**The Town and Country Planning (Environmental Impact Assessment) Regulations**  
**2017.**

**County Matter Application**

**Date** 20th August 2020

**Application Number** WSCC/036/20

**Description** 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, BN18 0XL

**Summary Response:** Objection

**Comments**

1. The application site is located at the Ford Circular Technology Park to the west of Ford and forms part of the former Ford Airfield and lies at approx. 6m AOD. The application site is partially used as an existing waste transfer station and comprises buildings relating to this business and areas of hardstanding and former hangars. Concrete access roads connect the site to Ford Lane in the east and to Ford Airfield Industrial Estate and Rollaston Park in the west. Agricultural land lies to the north, east and west with a sewage works and market site to the south. Further south lies Rudford Industrial Estate, HMP Ford and the village of Climping. The village of Yapton lies to the west. The River Arun lies approx. 1km to the east and the English Channel approx. 2km to the south. A railway line runs east-west approx. 900m to the north of the site before diverging north, south and east to the west of Littlehampton. The wider landscape is generally flat and low-lying before rising up to the South Downs approximately 2km further north.
2. The application site is surrounded by the Ford strategic allocation (known as 'The Landings') which is due to provide at least 1,500 dwellings, school facilities, a community hub (compromising retail, commercial and community facilities) a library, healthcare facilities and sports pitch. A public exhibition was held in January 2020 at which the latest proposals for 'The Landings' were presented.
3. Context/ baseline assessment
  - i. Landscape Character;  
The site lies within Chichester to Yapton Coastal Plain landscape character area (LCA) as identified in the West Sussex Landscape Character Assessment. Lower Arun Valley LCA lies immediately to the east of Ford Lane. The boundaries of other LCA lie close by to the south, north and east. Marine Character Area (MCA) 7: Selsey Bill to Seaford Head lies offshore to the south.
  - ii. Historic Landscape character;

## Landscape Architect Response to Planning Application

The site is identified as lying within the Historic Landscape Characterisation Broad Character Type 'Industry' and the Historic Landscape Characterisation Character Type 'Other Industry'

- iii. Designations;  
The South Downs National Park lies approx. 2.3km to the north. There are no designated ecological sites within the immediate vicinity, the closest is Climping Beach SSSI which lies approx. 2.8km to the south. There are a number of heritage assets and conservation areas in the surrounding area, the closest being the Grade II Atherington House and New House Farmhouse and the Grade I Parish Church of St Andrew.
- iv. PROW;  
Footpath 200-3 runs along the entrance road from Ford Lane and connects with other local PROW, it also forms part of the promoted 'Canal Walks' which follow the course of the former Chichester and Arundel Canal.  
The Monarch's Way long-distance footpath lies approx. 4km to the north on higher ground.
- v. Common land and OAL;  
The closest Registered Common Land/Open Access Land to the site is The Pond at Horsemere Green which is located approx. 1km to the south of the site.
- vi. Settlement:  
Ford is a small, scattered settlement comprising a group of older buildings centred on the junction of Ford Lane and Station Road close to the Grade I listed church, small developments of post-war houses at Rodney Crescent and Nelson Row, The Ship and Anchor riverside public house and an area of park homes to the east of Ford Station
- vii. Tranquillity;  
In my opinion the site is generally tranquil despite occasional traffic and train noise and some noise associated with current site use.
- viii. Visibility and Views;  
Due to the flat landform and the scale of the proposed development including the stack it is likely that this will be a highly visible feature in near and middle-distant views of the site. Even where vegetation provides some screening the built form is likely to be visible above this. In more distant and elevated views including those from the South Downs or from the sea it is likely that the built form will break the horizon..

#### 4. Relevant landscape-related planning policy;

West Sussex Waste Local Plan (April 2014)

Policy W10: Strategic Waste Allocations

Policy W11: Character

Policy W12: High Quality Developments

Policy W13: Protected Landscapes



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### Arun Local Plan 2011-2031 (July 2018)

Policy LAN DM1: Protection of landscape character

Policy LAN DM2: The Setting of Arundel

Policy D SPI: Design

Policy D DM1: Aspects of form and design quality

Policy HER DM3: Conservation Areas

Policy HER DM5: Remnants of the Portsmouth and Arundel Canal

Policy ENV SPI: Natural Environment

Policy ENV DM5: Development and Biodiversity

Policy W DM3: Sustainable Urban Drainage Systems

Policy QE SPI: Quality of the environment

Policy QE DM1: Noise pollution

Policy QE DM2: Light pollution

### Ford Neighbourhood Plan 2017-2031 (January 2019)

Policy EH1: Protection of trees and hedgerows

Policy EH8: Light Pollution

Policy EE10: Quality of Design of commercial buildings

A Pre-app meeting was held on 11<sup>th</sup> February

A Response to Planning Consultation Request for Scoping was issued on 17<sup>th</sup> February

A Conference call was held on 1<sup>st</sup> May to discuss proposed viewpoints

## **5. The submitted Landscape Design 2829-01-SK002**

- 5.1. Due to the height and scale of the proposals, including the EfW and the stack, effective onsite screening is not feasible as the applicant acknowledges. In order to screen the built form effectively considerable off-site planting would be required in conjunction with 'The Landings'. The space allowed for landscape proposals even limits the opportunity for effective screening in close views.
- 5.2. Opportunities exist for much more effective screening tree-planting to be provided offsite in conjunction with 'The Landings' to mitigate the impact of views from offsite towards the EfW/WS&TF and protect the amenity of future residents. An opportunity also exists to work with the developers of 'The Landings' to ensure the proposed habitat connects via 'The Landings' to the wider landscape thus providing maximum benefits for ecology.
- 5.3. Within the parameters of the very limited space allocated for the onsite landscape proposals they do appear to be generally sound and achievable. The plan would benefit from showing existing features, such as the offsite coniferous tree belt and public rights of way to provide context. The north point is incorrectly orientated.
- 5.4. I would wish to see scrub planting and hedgerow mixes that are better informed by the local ecology. To the bunds I would wish to see some additional native tree planting, rather than reliance solely on scrub mix. These could be concentrated towards the lower slopes to better disguise the alien landform.
- 5.5. I consider there are opportunities for additional tree and shrub planting within the two car parking areas (to north-east and south-west) to provide greater ecological

## Landscape Architect Response to Planning Application

enhancement, amenity and natural shading and provide some separation and enclosure for the car parks both from the wider EfW site.

- 5.6. Consideration should be given for the long-term prospects of the off-site coniferous tree belt and suitable advance tree-planting should be proposed to ensure a continuation of screening of sensitive views from the north.
- 5.7. The inclusion of flint walls is a welcome feature although this would only be noticeable in very close views, and I would wish to see more detail of these provided. The wildlife pond is another welcome feature and marks the location of the former canal, however this will not be visible for visitors outside the site and I would wish some evidence of the former canal to be shown on the eastern boundary, as it is on the western side of the site to give context for visitors. I would wish to see details of the construction of the pond and any planting.
- 5.8. The nature trail path is a welcome feature however as it does not form part of a route leading to anywhere or form part of a circular route and as it is contained by the bund and the security fence, I cannot see it being very appealing. Greater thought should be given to this and how it might make a more appealing route for staff.
- 5.9. There are no proposals shown for the funnel-shaped piece of land to the north-west of the site and I would wish to see details of proposals for this, especially as it lies close to future housing within 'The Landings', and all land on the site, including the access roads and their verges.
- 5.10. I would wish to see the inclusion of climbers to the acoustic fence to both enhance biodiversity and mitigate their appearance whilst the trees and shrubs are establishing.
- 5.11. The colour and design of the security fence is an important factor and I would wish to see a colour and design selected that minimises its visual impact. Gates required for access and maintenance should also be shown. It should also be ensured that sufficient gaps are left to allow species such as hedgehogs to pass through the fence and access the newly-created habitat.
- 5.12. No details of proposed surfacing are shown beyond the area of paving around the entrance foyer and there are no details of the proposed fill for the gabions. More details of these are required.

### **6. The submitted Landscape Implementation and Management Plan**

The submitted plan is generally sound but I would recommend a soil survey be undertaken to ensure there is no on-site contamination or compaction and to ensure the long-term success of the landscape proposals

### **7. The submitted Landscape and Visual Impact Assessment (LVIA)**

An LVIA has been prepared by Terence O'Rourke Ltd on behalf of the developer Viridor and Grundon in support of the proposed development. The LVIA is included within the submitted Environmental Statement at Chapter 12 and supported by Technical Appendix H.

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### 8. Assessment methodology

The methodology setting out the way in which the LVIA has been undertaken is set out within Appendix H, with methodology for producing visualisation material set out in Chapter 12 at 12.15. These indicate the intent for the assessment work to follow the Guidelines for Landscape and Visual Impact Assessment (GLVIA), 3rd Edition (2013), published by the Landscape Institute and Institute for Environmental Management and Assessment, with visualisations prepared in accordance with 'Visual Representation of Development Proposals. Technical Guidance Note 06/19' by the Landscape Institute. Whilst it is noted that due to restrictions in place due to the Covid-19 pandemic the production of high accuracy visualisations has been affected, it is accepted that the visualisations are sufficiently accurate for the purposes of assessment. However, there are some very important and significant omissions from a number of key viewpoints that need to be addressed and these are included as Appendix B. Whilst there are not an insignificant number of visualisations requested I believe that it is proportionate considering the scale of the proposals and the potentially wide area of their landscape and visual impacts. Should more visualisations be provided once Covid-19 restrictions have eased it is expected that these would be of a greater degree of accuracy.

### 9. Landscape baseline

The account of landscape baseline refers to the Arun District Council (ADC) Arun Landscape Study (2006) as the most recent and fine-grained assessment of land outside the South Downs National Park and includes an assessment of landscape value and sensitivity. The submitted LVIA notes that 'the ADC assessment was prepared to assist selection of new major development areas and also omits areas of significant existing development, which skews its assessment of landscape sensitivity'. The LVIA also refers to the West Sussex Landscape Character Assessment (2003) 'to augment and inform this report's assessment of landscape value in addition to the ADC study'. The South Downs Integrated Landscape Character Assessment does not appear to have been referred to in LI3-Landscape effects on the South Downs national Park (SDNP).

9.1. I acknowledge that the strategic allocation will have a significant effect on the landscape character of the immediate area but the proposed Energy Recovery Facility and Waste Transfer Station have the potential to greatly impact the wider landscape character due to their more substantial bulk and height.

9.2. The submitted methodology refers to 5.44 of the GLVIA which states that;

- *'The value of individual contributors to landscape character, especially the key characteristics, which may include individual elements of the landscape, particular landscape features, notable aesthetics, perceptual or experiential qualities and combinations of the contributors.'*

9.3. In addition at H 2.40 it states that

*'Landscape designations should not be over relied upon to signify the value of landscape receptors. Other factors that can help in the identification of valued landscapes include:*

- *Landscape quality (condition)*
- *Scenic quality*

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- *Rarity*
- *Representativeness*
- *Conservation interests*
- *Recreational Value*
- *Perceptual aspects including wildness and or tranquillity*
- *Associations'*

9.4. I do not consider that sufficient consideration has been given in the landscape baseline to recreational value or perceptual qualities (including openness and tranquillity) and the long views to the South Downs which are a highly distinctive and very apparent due to the low-lying and flat landscape with relatively few trees. In particular the West Sussex Landscape Character Assessment highlights key characteristics of the Chichester to Yapton Coastal Plain (within which the site is located) as including:

- *Long views to Arundel, the Downs and to the distinctive spire of Chichester Cathedral*
- *The relatively open character of much of the area allows long views so that village church towers are important landmarks in views*

According to the West Sussex LCA, key issues highlighted with respect to the Chichester to Yapton Coastal Plain include;

- *Introduction of large scale industrial buildings and glasshouses with distribution sheds*

According to the West Sussex LCA, Landscape and Visual sensitivities on the Chichester to Yapton Coastal Plain include:

- *Key views to the South Downs... and Arundel*

The West Sussex LCA also notes in relation to the Chichester to Yapton Coastal Plain that

*'Industrial buildings, for instance in the Ford and Tangmere areas, are strong suburban element. Where these occur, they create visual confusion and poor definition between town and countryside, and erode distinctive landscape character.'*

9.5. Due to the considerable scale of the proposals and the location of the site towards the eastern edge of the character area it is informative to also refer to the adjacent character area Lower Arun Valley.

Key characteristics of the Lower Arun Valley include:

- *Long views of river valley towards the Chalk Downs and Arundel from the south*

Key issues highlighted with respect to the Lower Arun Valley include;

- *Loss of pastoral character of the valley*
- *Any large scale housing/commercial development*
- *Loss of long views to Arundel and the Downs*

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- 9.6. A more detailed examination of the landscape baseline may have resulted in different weighting to the sensitivity of the landscape receptors and affected the final significance.
- 9.7. The nearest landscape character area to the site within the SDNP is BI: Goodwood to Arundel Wooded Estate Downland. One of its listed key characteristics is
- *The panoramic views across the coastal plain*
- 9.8. According to the West Sussex LCA, Landscape Management/ Development Considerations specific to the Goodwood to Arundel Wooded Estate Downland include:
- *Pay particular attention to panoramic views, for example from the popular viewpoint at The Trundle, in planning any change in this or adjacent areas, including areas outside the National Park boundary.*
- 9.9. There is no consideration of the potential effects on the Seascape Assessment for South Marine Plan Areas (Marine Character Area 7: Selsey Bill to Seaford Head) which includes the following key characteristic;
- *Coastal geology dominated by chalk, also forming the prominent ridgeline of the South Downs visible in views from the sea*

### 10. Assessment of landscape effects

As discussed above I do not consider that enough consideration has been given to some of individual elements that comprise landscape character and to the effects on key characteristics of landscape character as defined in the West Sussex Landscape Character Assessment that a development of this scale and height could have. Even allowing for the age of this assessment and that of the ADC study they are still of relevance. Where they are considered to be out of date additional surveys should be undertaken.

10.1. As GLVIA states:

- *Existing assessments must be reviewed critically as their quality may vary, some may be dated and some may not be suited to the task in hand. Before deciding to rely on information from an existing assessment a judgement should be made as to the degree to which it will be useful in informing the LVIA process. (GLVIA 5.13)*
- *Existing assessments may need to be reviewed and interpreted to adapt them for use in LVIA – for example by drawing out more clearly the key characteristics that are most relevant to the proposal. Fieldwork will also be required to check the applicability of the assessment throughout the study area and to refine it where necessary, for example by identifying variations in character at a more detailed scale. (GLVIA 5.15).*
- *Even where there are useful and relevant existing Landscape character Assessments and historic landscape characterisations, it is still likely that it will be necessary to carry out specific and more detailed surveys of the site itself and perhaps its immediate setting or*

## Landscape Architect Response to Planning Application

*surroundings. This provides the opportunity to record the specific characteristics of this more limited area, but also to analyse to what extent the site and its immediate surroundings conform to or are different from the wider Landscape Character Assessments that exist, and to pick up other characteristics that may be important in considering the effects of the proposal. (GLVIA 5.16).*

- 10.2. With regard to Landscape effects on the site (L 1), I am surprised that the magnitude of effect at completion is considered to be 'medium beneficial' and the significance 'slight beneficial and not significant'. Whilst the proposed building is of a dramatic and modern design using high-quality materials of local provenance such as flint and there is proposed landscaping to the site boundaries, the scale of the proposed built form is nevertheless still very significant and potentially overbearing within the landscape character area due to its size and height. The existing buildings including the retained hangars, whilst large, have an almost agricultural appearance, not at odds with their rural location, and due to their comparatively low height and pale colouring are not obtrusive features and are often screened from view by intervening tree belts. The hangars also relate well to the site's history as an airfield. Regardless of the quality of the built form, the proposals will further erode the areas remaining rural character by introducing a large-scale industrial building with stack and occasional plume.
- 10.3. With regard to Landscape effects on the South Downs National Park (L 13) there is no acknowledgement that panoramic views are one of the key characteristics of this part of the SDNP, or any assessment of the effect that the proposals would have on these highly sensitive views.
- 10.4. It is also noted that there is apparently no consideration given in night-time landscape effects to the potential effects of plume at night, with light sources reflecting on the water droplets in vapour, and its likely contribution to eroding the rural character.
- 10.5. There is no examination at all of the potential effects on the Marine Character Areas as requested in my earlier comments.

### **11. Visual baseline**

- 11.1. The LVIA has tested the visual envelope of the proposed development site by considering the visual baseline conditions at 36 representative viewpoints. These viewpoints have been grouped variously to represent different types of visual receptors which might be expected to have broadly similar sensitivities, for example residents within 1.5km of the site or walkers on Public Rights of Way (PROW). Assessment of the sensitivity of these visual receptors (comprising value and susceptibility to change) is given in the tables which can be found at 12-39 to 12-59. Whilst this approach is considered sound, I feel that for the sake of transparency the grouping of viewpoints would benefit from more consideration. I would wish to see visual receptors in Conservation Areas, who are considered to be highly sensitive, assessed separately rather than in combination with other less sensitive receptors. Whilst I acknowledge that the receptor value and susceptibility to change is based on the highest in the group, this is somewhat confusing.

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- 11.2. There is a lack of consideration given to the very large number of future residents, and therefore visual receptors, of The Landings who will be living in close proximity to the site with its limited onsite screening. Unless there is much more effective offsite screening proposed there is a high risk that achieving an acceptable level of visual impact for these future residents is not achievable. The applicant and the developer of The Landings need to work together to ensure both schemes are acceptable.
- 11.3. A lack of consideration has also been given to some PRoW in the immediate vicinity such as 200-3 and 363. Additional viewpoints which I would wish to see examined are listed in Appendix A.
- 11.4. Some viewpoints, for example those representing views from St Andrew's Church (Viewpoint 14), would benefit from being taken from nearer to the receptor, for example in the churchyard to the front of the church where there are some open views to the site, to give a better impression of the existing view.
- 11.5. For clarity the report would benefit from the inclusion of those photographs which were not able to be taken due to Covid-19 and form part of 'The Landings' submission.
- 11.6. It is important that a LVIA is proportionate to the development proposed and with a development of such a considerable scale as this I would wish to see greater examination of closer viewpoints. Those that I wish to see examined are included in Appendix A.

### **12. Assessment of visual effects**

- 12.1. Some of the visual effects would, in my opinion be greater than stated, and the assessment as whole understates the magnitude of some visual effects. This may be partly due to the use of a 7-point scale which permits magnitudes to be described as low/medium, medium/high etc. However, I note that the highest magnitude given is medium-large. With a development of this considerable scale in such a flat landscape and residents/walkers at a close proximity I would anticipate some magnitudes of visual effects would be classed as high. One of the factors which contribute to the magnitude of visual effect is size/scale. A development of this scale would take up a large proportion of the view composition in viewers close to the site. This is not adequately reflected in the visualisations provided, with some key visualisations of the chosen viewpoints omitted. With this in mind I do not understand what criteria these views have met to warrant the downgrading of the magnitude of change from high to medium/high.
- 12.2. If the grouping of viewpoints to form visual receptors has resulted in this 'averaging out' of effects then I would suggest that it is more appropriate to re-examine those groupings. For example, for residents of Rodney Crescent or walkers on PRoW 200-3 close to the site I would anticipate the magnitude of visual effect would be high.
- 12.3. Whilst it is acknowledged that 'the appreciation of the design is subjective' I do not agree that the proposals may result in a 'feature of interest in a landscape that lacks

## Landscape Architect Response to Planning Application

distinctiveness'. The distinctiveness of this landscape, as discussed above, stems from its low-lying, coastal-plain character with historic villages and ancient churches set against the backdrop of the South Downs, albeit having been subject to modern housing development.

12.4. Greater consideration should be given to the impact of the proposed built form (including the stack and plume) where it breaks the horizon, including that of the South Downs or crosses the offing (the area of the sea seen below the horizon) in views from the north. The addition of angled elevations and vertical elements into these wide panoramic views is likely to be particularly noticeable when seen against the rolling downs or the horizontal offing.

12.5. I would wish to see greater consideration given to the choice of colours of the proposed built form and how they reflect the landscape character and might lessen the visual impact.

### 13. Visualisations submitted

13.1. The visualisations submitted as part of this applications (found at 12.48- 12.62) are considered very helpful in assessing the extent of the proposals. However, it is noticeable that some of the viewpoints closest to the site, where one would expect the effects to be most noticeable are lacking visualisations, specifically viewpoint 26 (Ford Lane) and Viewpoint 36 (Rodney Crescent). It is also noticeable that the visualisations do not show the plume which, although potentially visible on only approximately 25% of days, would still be a noticeable feature, and would draw attention to the built-form. The stack and plume are particular elements which would undermine the agricultural character of the landscape by introducing industrial features into views.

13.2. Of the viewpoint photographs which lack visualisations I have attached a list (at Appendix B) which indicates those which I would wish to see additional visualisations produced for in order to fully understand the visual effects of this development. Due to its considerable height it is likely to be very visible above intervening layers of vegetation and this needs to be examined.

### 14. Compliance with policy

West Sussex Waste Local Plan (April 2014)

14.1. As per my comments above I do not consider that the LVIA adequately assesses the impacts on the amenity of users of close public rights of way, close dwellings or future dwellings or offers sufficient mitigation or enhancement and is therefore contrary to the development principles of Policies W10.

14.2. Even in more distant views where the degree of visual intrusion may be not so great, due to the high sensitivity of these receptors the resultant impact is considered significant and contrary to Policy W10.



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- 14.3. The very limited onsite landscaping scheme submitted does not provide acceptable mitigation as required by Policy W10. It will require a significant offsite element to be considered acceptable considering the adjacent housing/mixed use allocation. There exists an opportunity for the applicants to work in conjunction with the developers of 'The Landings' to ensure that existing residents and future residents of 'The Landings' are protected from any loss of amenity through careful site planning and mitigation measures. I would wish to see this opportunity explored.
- 14.4. I consider that the proposals will have an unacceptable impact on *'the character, distinctiveness, and sense of place'* and fail to *'reflect and, where possible, reinforce the character of the main natural character areas (including the retention of important features or characteristics)'* and are therefore contrary to Policy W11.
- 14.5. I consider that the proposals do not adequately *'take into account the need to: (a) integrate with and, where possible, enhance adjoining land-uses and minimise potential conflicts between land-uses and activities; (b) 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;'* and are therefore contrary to Policy W12.
- 14.6. Furthermore I do not consider that the proposals accord with Policy W13: Protected Landscapes (with regard to the SDNP) and will *'undermine the objectives of the designation'* by causing significant adverse effects, as established within the submitted LVIA.

## 15. Conclusion

- 15.1. Due to the considerable height and size of the proposed development and its location within a low-lying and flat coastal plain landscape it is unsurprising that the impacts are found to be far-reaching and significant. The limited screening possible and proposed does little to mitigate these effects. There are a large number of sensitive landscape and visual receptors within the study area which all have the potential to be significantly and adversely impacted by the proposals including the SDNP, listed buildings and conservation areas. Visual receptors also include walkers on the many local PRow and existing and future residents of the area including the large proposed development at The Landings which surrounds the site.
- 15.2. The LVIA omits to assess the impacts on a number of key receptors and greater discussion of the method of assessing sensitivity and effects for each receptor is required. Grouping of visual receptors is also not considered helpful in some instances. The assessment of landscape effects would benefit from greater examination of all the constituent elements which comprise the landscape and its character.

## Landscape Architect Response to Planning Application

15.3. Notwithstanding my comments above, and the report's apparent lack of a conclusion of its own, the LVIA as submitted concludes that out of the 13 landscape receptors assessed 8 would be considered to experience significant adverse effects, including the highly sensitive South Downs National Park. Of the 22 visual receptors assessed 16 would be considered to experience significant adverse effects including visitors to the South Downs National Park. The proposed built form is of such a large scale and mass as to have a significant adverse impact on visual receptors both close to the site and further away and also to impact adversely landscape character over a considerable geographical area.

15.4. Due to the adverse impact on heritage assets and PRow and the lack of a comprehensive landscaping scheme which mitigates these impacts, because of the adverse impacts on the character and sense of place, the scale/form/design of the proposals being such that they will not integrate and enhance adjoining land uses, because it will adversely affect local context including landscape, skyline and views into and out of the area, and because it would undermine the objectives of nearby protected landscapes, and in particular the South Downs National Park, the proposals are contrary to the West Sussex Waste Local Plan Policies W10, W11, W12 and W13.

The terra firma Consultancy / Keith Baker for and on behalf of West Sussex County Council  
(Environment & Heritage Team)

### APPENDIX A

#### Supplementary viewpoints and visualisations requested

Description	Reason
Close PRow to north and west of site (366/ 363/ 200-2 Old Canal)/ 200-3/200-4/359) which will be within The Landings	Representative of local footpaths and future residents of The Landings
Close PRow 175 to south of site which will be within The Landings)	Representative of local footpaths and future residents of The Landings
Riverside PRow further south than VP 14	Representative of PRow users
From western side of churchyard of St Andrew's, Ford	Representative of Church visitors and PRow
Views from sea	Representative of Marine Character Area with views to South Downs

# West Sussex County Council

## Landscape Architect Response to Planning Application

### APPENDIX B

#### Supplementary visualisations requested

TOR Viewpoint Number	Description	Reason
5	Poling Street	Represents mid-range views in countryside to east
6	East of Littlehampton	Represents footpath users and residents in the Arun Valley
9	Night view from Nore Folly	Day time view and visualisation requested
11	Ford Lane	Representative of close views from local roads and dwellings
13	Lyminster Conservation Area	Representative of views within Conservation Area and adjacent to Grade I listed church
16	Ford airfield	Representative of residential views on Rollaston Park new dwellings on 'The Landings'
17	North edge of Middleton on Sea	Representative of residential views towards South Downs.
19	SDNP PROW	Representative of views from lower slopes of SDNP to north of A27 where there is intervening woodland.
21	A259 Bognor	Representative of residents, PRoW and motorists crossing the open coastal plain
25	St Mary's Climping	Representative of views within Climping. To demonstrate potential screening effect of trees
26	Ford Lane	Representative of workers, motorists, local PRoW and residents of Atherington Ho etc.
30	North of Arundel Castle	Representative of views from Arundel Park within SDNP.
31 (Landings VP11)	Arundel Castle Keep	Representative of view from Grade I listed Arundel Castle. A key view for Arundel Castle and SDNPA
32 (Landings VP10)	West of Littlehampton	Representative of residents on the west of Littlehampton looking across the Arun valley

# West Sussex County Council

## Landscape Architect Response to Planning Application

33 (Landings VP 8)	PROW 166 south-east of Burndell/Yapton	Representative of PROW and residents
34 (Landings VP3)	Horsemere Green	Representative of effects on local residents and motorists
36	West of Rodney Crescent	Representative of neighbouring residents and PRoW

## Raymond Cole

---

**From:** Fiona Fitzgerald  
**Sent:** 06 August 2020 14:32  
**To:** Planning.Responses  
**Cc:** Raymond Cole  
**Subject:** WSCC/036/20

Dear Ray,

Please find Environmental Health comments for air quality and the emissions mitigation statement.

I should clarify that I have only had time to read the sections on air quality and the emissions mitigation statement at present. Therefore there may have been mention of mitigation measures included in other documents that I have not had chance to look at.

### **Air Quality**

- The applicant has carried out an emissions mitigation calculation in line with the Air Quality & Emissions Mitigation Guidance for Sussex (2020). This has calculated a five year cost of £9,025. However the guidance requires that a mitigation statement should include proposed mitigation measures which should equal the health damage cost. The mitigation options should be designed into the development from the outset. In this case I cannot see that any proposed mitigation measures have been suggested and the applicant should refer to both the Standard Mitigations and Table 2 of the above guidance to propose mitigation measures for consideration by the planning authority.
- I have noted that Section 3.1 of the walking, cycling and Horse Riding Assessment Report dated June 2020 by Ramboll lists a number of opportunities for improving cycling and pedestrian connections but I can not see that these have been incorporated into the design.
- EV Charge points should be included in the scheme for staff parking and vehicles used on site should be electric where possible.

### **Environmental Permitting**

- This activity will be permitted by the Environment Agency and they are best placed to make comments on this issue as they should already have been involved with the development of the plans.

Regards

Fiona

## Raymond Cole

---

**From:** Sue Howell  
**Sent:** 23 July 2020 16:55  
**To:** Planning.Responses  
**Cc:** Raymond Cole; Rachel Alderson; Joe Russell-Wells  
**Subject:** RE: Planning Consultation on: F/15/20/WS

### Response to Planning Application

**From:** Arun District Council Greenspace

**Date:** 23 July 2020

**Application ref:** F/15/20/WS

**Description:** 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. This application is a County Waste Matter will be determined by West Sussex County Council.

**Location:** Ford Circular Technology Park Ford Road Ford BN18 0XL

**Determining Authority:** WSCC

**Summary recommendation:** I would recommend that landscape detail is provided at an early stage to demonstrate how mitigation and screening requirements will be addressed. These requirements should not be underestimated considering the proximity to existing and adjacent planned residential proposals. The impact on the wider environment of the surrounding District also requiring that mitigation landscaping be provided to soften the immediate impact and important distant views. This would need to provide appropriate planting measures which will establish and mature as the site develops.

---

## Comments

### Relevant landscape designations:

There are no environmental or cultural heritage designations on the site or built heritage assets.

There are heritage assets in the surrounding area including Yapton Church Lane and Main Road/Church Road conservation areas 1km and 1.3km to the west of the site.

The site is located 2.2km to the south of the South Downs National Park.

### Response

The site is presently in use as a waste plant and occupies, predominantly the central section of the red edge site. The site is partially vacant with parking and porta cabins to the west, 2 hangers to the north and hardstanding to the south.

Access to the site is via Ford Road to the south. Existing sports pitches and sewage treatment works lie to the south of the site with further hardstanding for market use south again to the sewage works.

The influence of the site upon the wider character area is restricted through low lying topography and limited intervening vegetation. It sits on the rural fringe of Ford and Yapton in an area of existing commercial development.

The proposed energy recovery, waste sorting and transfer facility is considerable in size and massing and will sit well above the existing skyline. There is some existing vegetation on the boundary of the site and along nearby field boundaries, but the images provided demonstrate this will have little effect in screening views of the building structure, both near and distant. The coastal plain does not provide the natural landform which would assist in delivering a more elevated, enhanced screening solution.

The NPPF para 124/127 relate to good design principles which equally apply to commercial development. LVIA viewpoints with photomontage have been carried out which go some way to assessing the impact on the area from differing locations. It is clear to see from these that the impact on the area will be significant in height and scale and where detailed work would be required to demonstrate the effectiveness of any proposed mitigation measures.

The proposed development site is immediately adjacent the site of the submitted application F/4/20/OUT for 1500 residential dwellings. Consideration of how the proposed waste facility will impact on existing and future residents is required, as well as the existing sports facilities, in terms of visual, noise and odour issues. The presence of the waste facility has the potential to impact greatly on existing adjacent dwellings, the proposed housing development, the enjoyment of the public open space and use of the adjacent sporting facilities.

## **Impact**

The proposed development will impact greatly the immediate area and beyond including from mid and distant views where it will remain obvious. Pollution would be anticipated from increased trafficking to support the facility along the potential for negative environmental, biodiversity, air quality, noise and habitat impact.

## **Mitigation/requirements**

Whilst the inclusion of a substantial landscape scheme should be integral to the development, there is little evidence of this shown to the layout at present. Acoustic fencing is indicated with some indicative landscaping, however the restriction that the site presents with the footprint of the available site would go nowhere towards allowing the space required for a robust and effective landscape scheme to be implemented.

The proposals shown have the potential to result in visual, noise and odour detriment, environmental impact including biodiversity and habitat loss. Any opportunities to enhance the existing landscape setting and biodiversity improvement should be considered.

## **Recommendation/Conclusion**

I would recommend that landscape detail is provided at an early stage to demonstrate how mitigation and screening requirements will be addressed. These requirements should not be underestimated considering the proximity to existing and adjacent planned residential proposals. The impact on the wider environment of the surrounding District also requiring that mitigation landscaping be provided to soften the immediate impact and important distant views. This would need to provide appropriate planting measures which will establish and mature as the site develops



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Mr Chris Bartlett  
West Sussex County Council  
County Planning, 2nd Floor Northleigh  
County Hall  
Chichester  
West Sussex  
PO19 1QT

Direct Dial: 0207 973 3642

Our ref: P01208738

16 September 2020

Dear Mr Bartlett

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**FORD CIRCULAR TECHNOLOGY PARK, FORD ROAD, FORD, ARUNDEL BN18  
0XL  
Application No. WSCC/036/20**

Thank you for your letter of 8 July 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Impact upon Setting**

The proposed height and massing of the development is considerable and would represent an unusually tall structure upon the coastal plain. It therefore has the potential to impact upon the setting of heritage assets, historically important viewpoints, and the general historic landscape character, over a wide area.

Impact upon settings of Listed Buildings

a) St Andrew's Church, Ford

We have serious concerns regarding the impact of the proposed waste facility on the significance of the Grade I St Andrew's church (Ford) through changes to its setting.

St Andrew's is notable as a largely Norman two cell church with a later chancel, 14<sup>th</sup> century belfry and a distinctive brick Dutch gabled south porch which was added in 1637. The wide open rural landscape surrounding the church forms part of its setting and this plays an important contribution to its significance as it highlights the isolated nature of the church.

The visualisation submitted at viewpoint 14, to the east of the church on the bank of



the river, indicates that the proposal would have a significant impact on the rural character of the church's setting. The proposed buildings would rise high above the existing treeline, with the stack rising even further. The design and scale of the buildings are of particular concern. The monolithic character of the buildings and their height would greatly reduce our appreciation of the wide, open rural landscape surrounding the church.

The ES notes that the existing buildings at the site and other buildings such as the prison and the houses of Nelson Row are visible as part of the developed area within this view. We think however, that these are largely subservient to the tree line and remain relatively unobtrusive within the church's setting. We agree with the ES's conclusion that the proposal will have a 'permanent substantial adverse effect' to the qualities and character of the setting of the church (10.105), and we therefore have serious concerns regarding the impact to the church's significance.

We note that only one viewpoint has been provided of St Andrew's church and we think that further visualisations from within the churchyard looking westwards towards the site are necessary to understand the full impact of the proposal on this heritage asset.

#### b) St Mary's Church, Climping

There may be further, lesser impacts on St Mary Climping (Grade I), although a lack of visualisations of this makes it difficult to assess.

The medieval church is of significance for its historical and architectural value as a large rural medieval church set within a walled churchyard. Its wider rural setting is still somewhat appreciable, despite the modern industrial development on the former airfield to the west, which is partially obscured by trees.

Although a viewpoint has been provided, no visualisation has been submitted as part of the application, and we think that this is necessary to understand the level of harm that the proposal would have on this asset. We do not think that it is possible to ascertain as the ES has done, that the 'proposed development will not alter the qualities and character of the setting' of the church at Climping. We therefore encourage the applicant to provide a visualisation from this viewpoint so that the impact can be adequately assessed.

#### c) Grade II listed buildings

It is not within Historic England's remit to comment on proposals' impacts to Grade II listed buildings through changes in their setting, and we defer to the conservation officer on these matters.



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However, we would briefly note that the proposal is in close proximity to Atherington House, a late 17<sup>th</sup> to early 18<sup>th</sup> century farmhouse, whose setting largely comprises of open rural landscape, albeit somewhat marred by the existing industrial buildings on the proposal site. We note that while a viewpoint is provided (number 26) a visualisation has not been submitted from this location. However, we think that the height, design and scale of the building as well as its proximity would have a negative impact on the listed building through changes to its setting, and that this would be towards the higher end of less than substantial.

### Impact upon Conservation Areas

We think that the proposal would also have an adverse impact on the conservation areas of Church Lane at Yapton and Lyminster through changes to their rural settings.

Viewpoints and visualisations 24 and 36 indicate that the proposal would be extremely visible in from the fields bordering the conservation areas and would intrude on the low, rural landscape that form the village's wider rural setting. However, while it is clear that the proposal would have an impact on the setting of the conservation areas, visualisations from within these conservation areas are lacking. It is therefore difficult to assess the full extent of the impact to these conservation areas without these.

### Impact upon setting of Scheduled Monuments

The development also has the potential to impact upon the setting of a number of scheduled monuments in the vicinity.

These monuments are Climping Deserted Medieval Settlement (List Entry Ref: 1005828), and Tortington Augustinian Priory (List Entry Ref: 1021459). The significance of both of these monuments derives at least in part from their retention of predominantly undeveloped and rural surrounds, the character of which may be impacted depending on how visible the new development appears within them.

We acknowledge that existing vegetation and development exist between the development and both Climping's historic core and Tortington Priory. However we also note that no visualisations have been provided to assess or demonstrate exactly how prominent the development might be from these designated assets. Without such, it is not possible to determine the development's precise level of impact.

### Impact upon the setting of Arundel and heritage assets within it

The development also poses potential harm to the setting and appreciation of Arundel and some of the heritage assets within it.

Historic Arundel - itself designated a Conservation Area - contains a number of



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designated heritage assets, including the scheduled and listed Castle and grade I listed cathedral. The broad expanse of coastal floodplain that lies directly below Arundel to the south - and ultimately extends all the way to the coast - is a very important element of the setting of the whole.

This area would always have been a marginal hinterland exploited for its resources and most importantly as a means of access and transport to the sea; first as a sea inlet and later as a marshy estuary through which the river Arun flowed. As such the retention of this plain as an open and undeveloped area (and the preservation of unimpeded views across it) contribute significantly to an understanding of the town's historic past. This landscape is thus not one capable of easily accommodating change.

Although the development would sit on a site already developed and at some distance from Arundel, the introduction of such a large structure in this location thus has the potential to intrude into these highly significant views and detract from our appreciation and understanding of the town, and its relationship with the coast and surrounding landscape.

Visualisation 4 (from low-lying land just south of Arundel) shows that the development site would be a visible intrusion into important southwards views. Whilst the visualisation shows that the development will certainly impinge upon this view, it also shows that - at this low level - it is unlikely to intrude into this view in such a way as to cause a high level of harm.

The development is however likely to be more damaging to heritage significance when viewed from points within the town of Arundel itself, due to its more elevated elevation and thus the increased visibility it affords. Views from Arundel Castle in particular will need to be considered as they are integral to the significance of this most highly graded asset, and because the castle represents the most elevated point within the town.

The importance of these views and the need for their protection is also highlighted explicitly within the local plan for Arun (7.5.9). This states that "views out from [the town] are equally important [as views in]" and that "all views stretching across the river flood plain to the coast from more elevated positions within the town...are worthy of protection...some of them are particularly important as they include a view of the Castle or the Cathedral."

Unfortunately the application does not properly assess or demonstrate the development's impact upon these significant views or the assets to which they pertain. There are no visualisations from the Castle itself or from other significant or high points within the town, e.g. St Nicholas' Church and Arundel Cathedral which also sit at the top of the town along the ridge line. The only visualisation provided from the town (Visualisation 29 from the Roman Catholic Cemetery) is not useful for assessment

because of a tree in the immediate foreground.

### Impact upon Historic Landscape Character

The development will also have an impact upon historic landscape character. Whilst the site is already developed, the massing and height of the proposal will comprise a considerable intrusion into views across the surrounding landscape which - to the north at least - retains as a largely open, undeveloped and rural character; a survival of medieval and post-medieval field systems and use.

### **Impacts to undesignated archaeology**

The development also has the potential to impact upon undesignated archaeological remains, including deposits of geo-archaeological interest.

Your main advisor for this element of the historic environment should be the West Sussex County Council Archaeologist, John Mills. However please note that the Historic England Science Advisor is available to advise the WSCC Archaeologist on archaeological science issues, if required.

### **Relevant Policy**

The NPPF requires that heritage assets should be conserved in a manner appropriate to their significance (para. 184), and that great weight should be given to the conservation of the significance of a designated asset (para. 193). Any conflict between an asset's significance and a development proposal should thus be avoided and minimised. This includes any impact the development may have upon the asset through impact upon its setting (para. 190).

The NPPF also requires that planning applications for proposed developments should describe the significance of any heritage asset affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and sufficient to understand the potential impact of the proposal on their significance (para. 189).

In determining applications, local planning authorities should also take account of the desirability of new development making a positive contribution to local character and distinctiveness (NPPF, para. 192).

The Local Plan for Arun also states that "designated heritage assets and Conservation Areas will be given the highest level of protection [and] development likely to prejudice any of the above, including their settings, will be refused" (Policy HER SP1).



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## Position and Recommendations

We note that the development's impact upon the setting of some heritage assets has not been sufficiently assessed to allow us to determine the development's overall impact.

We therefore recommend that this application is not determined until sufficient further assessment has been submitted (NPPF, para. 189).

In particular, there is a need for further visualisations of the development from:

- St Andrew's Churchyard;
- Climping's historic core (the church and scheduled monument);
- Within Yapton and Lyminster conservation areas;
- Tortington Priory;
- Assets within Arundel (including Arundel Castle and other elevated points within the town of heritage significance).

We nevertheless do already have concerns about the proposal. Where impact to setting has been adequately assessed, it is clear the development will have an impact upon assets' significance; and for some assets this level of harm is likely to be high.

In this respect, we think the proposal may fail to meet the requirements of the NPPF (paras. 184, 190 & 192). Nor does it align with the policies of the Local Plan for Arun (Policy HER SP1).

Finally, we recommend that you take the advice of the WSCC County Archaeologist with regard to the proposal's impact upon undesignated archaeology. Please also note that the Historic England Science Advisor is available to advise the WSCC Archaeologist on archaeological science issues, if required.

Yours sincerely

### **Maria Buczak**

Assistant Inspector of Ancient Monuments  
E-mail: [maria.buczak@HistoricEngland.org.uk](mailto:maria.buczak@HistoricEngland.org.uk)

cc: Isabelle Ryan, Assistant Inspector of Historic Buildings and Areas, Historic England



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.

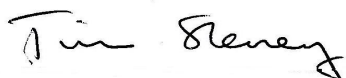
As stated, we accept that the neighbouring Strategic Housing Site will also have an impact on the National Park (particularly in the panoramic views of the Arun Valley / coastal plain), however, it is the combination of the scale, height, bulk (in particular) and colour choices (notably the 'coppery 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**  
Kelly Porter  
kelly.porter@southdowns.gov.uk



## **Appendix 3**

**Table A4 - Extract from the Ford ERF Environmental Risk Assessment, prepared by Fichtner Consulting Engineers Ltd and submitted to the Environment Agency as part of the Environmental Permit application suite of reports.**

## 5 Table A4 – Accidents risk assessment and management plan

What do you do that can harm and what could be harmed?		Managing the risk	Assessing the risk		What is the overall risk?	
Hazard	Receptor	Pathway	Risk management	Possibility of exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that remains? The balance and probability and consequence
Unauthorised waste acceptance	Immediate area – air, land.	Air, direct contact	Waste pre-acceptance and acceptance procedures will be in place to reduce the likelihood of accepting unauthorised waste. A quarantine area will allow the safe segregation of waste identified as unacceptable prior to transport off-site. The crane maintenance arrangement will allow for back-loading of waste identified as unacceptable within the bunker. Documented management procedures will be in place to cover unauthorised waste acceptance.	Unlikely.	Low.	Not significant.
Spill and leakage of fuel and chemicals.	Immediate area – air, land, water.	Direct contact.	Training in unloading practices. Under manual	Unlikely.	Low.	Not significant.

What do you do that can harm and what could be harmed?		Managing the risk		Assessing the risk		What is the overall risk?
Hazard	Receptor	Pathway	Risk management	Possibility of exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that remains? The balance and probability and consequence
Overfilling of vessels.	Local environment air, land, water.	Surface runoff, wind.	Training in unloading practices. No unauthorised offloading until it is confirmed that adequate capacity is available to receive the delivery. Under manual control, continual observation. Impervious surfaces outdoors and indoors (with contained process drainage systems). High level alarms. Secondary containment for storage vessels with suitable segregation measures.	Unlikely.	Low.	Not significant.

What do you do that can harm and what could be harmed?			Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk management	Possibility of exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that remains? The balance and probability and consequence
Leak of water from treatment plant, and leak of boiler water treatment chemicals.	Immediate area – water.	Surface runoff	<p>Management procedures in place to deal with spillages.</p> <p>Secondary containment for storage of water treatment chemicals such as bunding. Routine inspection and maintenance. Impervious surface indoors, separate drains for process water. Regular preventative maintenance of storage vessels to confirm the integrity of the storage vessel.</p>	Unlikely.	Pollution of surface water.	Not significant.
Flue gas leak.	Local environment – air.	Air.	<p>Design standards. Inspection and maintenance programme. Controls and alarms for pressure. Most of the systems are retained at negative pressure. Emissions monitoring systems to detect exceedances.</p>	Very unlikely.	Pollution of atmosphere, health impacts.	Not significant.

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Waste storage failure.	Immediate area – litter.	Direct contact.	Storage of waste in a dedicated waste storage bunker. The bunker will be constructed of reinforced concrete, with integrity checks undertaken during construction and during annual maintenance periods.	Unlikely.	Litter.	Insignificant.
Control failure leading to combustion control upset.	Local environment – air.	Air - Winds generally blow from a south westerly direction.	Good design of control system. Monitoring of combustion conditions. Maintenance of combustion air systems.	Unlikely,	Pollution of atmosphere (short term), human health impacts.	Not significant.
Failure of emission abatement equipment.	Local environment – air.	Air - Winds generally blow from a south westerly direction.	Regular maintenance, inspections. Redundancy of critical equipment or spares on stock.	Unlikely.	Pollution of atmosphere, human health impacts.	Not significant.
Failure of emission monitoring systems.	Immediate area – air.	Air - Winds generally blow from a south westerly direction.	Regular maintenance, inspections. A back-up CEMS system will be available in the event of a failure of the CEMS.	Unlikely.	Lack of data, public concern.	Not significant.

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Failure of containment (e.g. bund).	Immediate area – water, land.	Surface runoff, wind, leaching.	Regular inspections of bunds. Preventative maintenance will be employed through a documented management system.	Unlikely.	Pollution of surface water.	Not significant.
Making the wrong connections to drains.	Local environment – water.	Direct contact, leaching.	Detailed site drainage plan, which will be available to all staff. Drains will be labelled accordingly. High risk areas will not be connected to the surface water management system.	Low.	Pollution of surface water.	Not significant.
Incompatible substances from coming into contact (such as raw materials/reagents) causing unintentional chemical reactions.	Immediate area.	Surface runoff, wind, direct contact.	Due care and attention. Retention of Material Safety Data Sheets (MSDS) to identify hazards of substances to be used on site. Suitable segregation measures to be employed.	Low.	Pollution of surface water, human health impacts.	Not significant.
Unwanted reactions.	Immediate area.	Surface runoff, wind, direct contact.	Due care and attention. Retention of MSDS to	Unlikely.	Low.	Not significant.

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Loss of power.	None.	N/A	A back-up generation system to provide safe shutdown of the Facility in the event of loss of power.	Low.	None.	Not significant.
Loss of compressed air.	None.	N/A	Maintenance scheduled as per manufacturers specification. Critical spares stored on site.	Low.	None.	Not significant.
Loss of boiler water.	None.	N/A	Automatic shutdown of the Facility, back-up diesel pump to provide feedwater to the boilers.	Low.	None.	Not significant.
Steam leak to plant building/atmosphere.	Noise, visual impact.	Air	Statutory design, fabrication and inspection standards for steam systems. Controls and alarms for pressure. Routine operator checks.	Low.	Nuisance from noise and visual impact.	Not significant.
Residues handling failure.	Immediate area – air, land, water.	Direct contact.	Training in residue handling practices. Contained transfer	Unlikely.	Pollution of surface waters.	Not significant.

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			systems. Impervious surfaces in residue handling areas with designated drainage systems in areas where residues are stored.			
Fire in FGT bag filter.	Local environment.	Air - Winds generally blow from a south westerly direction.	Temperature measurement and level control in filter hopper, inert gas fire-fighting systems. The FGT bag filter will be located within the FGT building; therefore, any dusts/smokes/fumes would be contained.	Low.	Dust, pollution of air.	Not significant.
Fire in furnace feed system.	Immediate area – air.	Air.	Furnace charging procedures / training. Level indicator in chute. Fire-fighting system.	Low.	Pollution of air.	Not significant.
Over pressurisation of the boilers.	Immediate area – air.	Direct contact.	In case of over pressure, the pressure will be released through waste hopper and ash quench preventing the risk of an explosion within the boilers.	Low.	Pollution of air.	Not significant.



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Fire in waste reception storage and handling areas.	Immediate area – air.	Direct contact.	Fire detection and suppression systems.	Low.	Visual impact, pollution of air.	Not significant.	
Fire from ignition of lube oil leak.	Immediate area – air.	Wind, direct contact.	Fire detection and protection systems.	Low.	Visual.	Not significant.	
Contaminated fire water.	Immediate area – water, land.	Surface runoff, leaching.	Site drainage for external areas will be fitted with an isolation valve which is activated by the fire detection systems. Additional storage will be available from kerbing and roadways. The primary source of firewater containment will be the waste bunker, which is designed as a water-retaining structure.	Low.	Pollution of surface water.	Not significant.	
Failure to contain firewater.	Land.	Land, water, groundwater.	Maintenance of the shut-off valve and/or pumping system within the drainage system.	Unlikely.	Release of chemicals to water.	Not significant.	

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Vandalism.	Immediate area.	Land, air, water.	<p>Inspection and maintenance of roadways and areas of hardstanding.</p> <p>Security fences, controlled entrance to the site. 24 hour presence on site with CCTV monitoring.</p> <p>Security infrastructure will be inspected regularly to identify defects and the need for timely repairs to be undertaken.</p>	Low.	Release of substances to any environment.	Not significant.