

## Planning Application WSCC/011/21

### EFW Plant (Incinerator) at Ford by Grundon and Viridor - July 2020

#### **Objection and comments from A.J. Lovell MSc. C.Eng, FICE FiHT (Retired)**

##### **Initial remarks:**

1. This Application is the replacement for the earlier WSCC/036/20 which was subsequently withdrawn following a huge number of objections on a whole range of relevant planning issues. This new application is claimed by the applicant to have a "significant" number of changes including: - site layout, building footprint and design, height and landscaping.

##### **The reality is very different:-**

The application is for exactly the same purpose (burning waste to create energy); the same volume of material 275000 tonnes of waste plus 20,000 tonnes for recycling; the same amount of lorry traffic; the same environmental impact; two rather than one chimneys of the same 85 metre (276 feet) height; and the reduction in building size is in truth insignificant as its visual impact will be similar. (Length 133m instead of 176m, width 132m instead of 134m, height 38.5 metres instead of 51.2).

On reading the submitted 'Non –Technical Summary' I find that in their view this enormous waste processing plant will have almost no impact on any of the matters that concern the people who live in and around this area. Frankly, it beggars belief and inevitably leads me to question the veracity of the whole submission as it misrepresents on so many issues. [I will explain more on this in the remainder of this statement of objection.]

N.B.I would therefore suggest that all of the points made by the many objectors to the previous submission hold equally to this one and should therefore be considered as relevant. This is important because many people not familiar with the planning system may well assume that as the application is virtually the same, their previous objection should be sufficient.

##### **The substance of the objection**

As before, my objections are under the headings of:

- unsuitability of location (flat coastal plain surrounded by farmland and housing)
- scale and height of building (extensive visual impact)
- traffic movements (scale of impact)
- access roads ( a fundamentally unsuitable local road network)
- other potential environmental impacts

Beyond these basic planning issues I would also question both:

- a) the need for this facility at all, does West Sussex actually require this additional capacity to deal with its own waste, especially in the light of the recently approved new site at Horsham?
- b) And, the suitability of burning waste to create energy in a rapidly evolving energy market and the government's intentions to develop more green forms of energy?

These are more fundamental issues for WSCC, as waste disposal authority, to consider but they are of course very relevant to any decision to allow this application to proceed, or to reject it.

**This application is quite simply a classic example of a commercial waste management company seeking to provide a major new facility in a totally unsuitable area and requiring the delivery of waste from a huge surrounding area outside of West Sussex (from Southampton to the border with Kent) in order for it to be financially viable. It will irrevocably impact badly upon, and damage, the areas for several miles around and must be rejected.**

### **Points for Objection**

#### **1. Location:**

The proposed site is surrounded by an area that is largely rural farming country with the relatively small villages of Climping, Yapton, Ford and the western fringes of Littlehampton close by. It also abuts the Rudford Industrial estate but this is quite small and has no major businesses, certainly nothing anything like the scale of what is now proposed.

In addition, and significantly, we have the proposed 1500 home residential site planned for the Ford Airfield which is immediately adjacent to the Incinerator site. This is contrary to WHO guidelines.

Thus the whole surrounding area may be characterised as semi rural, though the new airfield development will change that to some extent. It is also adjacent to the South Downs Country Park and close to the historic town of Arundel.

The new building is of such a size (see next point) that it will be visible for many miles and will be the dominant feature in the views from the south downs, just as Arundel Castle and Cathedral are from the south at the moment. But what a hideous comparison that would be!

#### **2. Scale and height of buildings:**

The size of the 'new' main operational building has been scaled from the plans as:  
Length – 133 metres, width – 122 metres, height 38.5 meters, plus twin stacks (chimney) each 85 metres tall.

This is just the main building, not the whole site which far larger and contains other smaller buildings.

For comparison, the height of the main building is about the same as a 13 storey high block of flats.

And the height of the chimney is about 263 feet tall or about the same as a 26 storey block of flats.

There are no other buildings of a comparable size for miles around. At present the main features on the wider landscape are the gas storage tanks at Littlehampton and the Kingmere block of flats, also at Littlehampton which is about the same height as the proposed processing building. Many people regard that as a regrettable 'blot on the landscape' and a big planning mistake!

There can be no doubt that a building of this size will dominate the views of the whole area which is currently unspoiled by anything tall, and this helps to retain its rural character.

The visual impact of this new building would totally change that and damage the character of the whole surrounding area and all the villages within it.

### **3. Traffic movements and access roads:**

Catchment area: First we must recognise that waste material would be imported not just from West Sussex, but also from all the surrounding Counties listed in the submission as: East Sussex, Hampshire, Surrey and the major towns of Portsmouth, Southampton and Brighton.

So some vehicles will travel quite long distances through West Sussex in order to bring their waste to be processed in this relatively quiet corner of this county. That makes no sense at all unless you are the company deriving its profitability from such a wide catchment area. Just think of the additional miles travelled every day throughout the county.

And then there is the future? We have already seen how the applicant will ask for one permission and later seek to upgrade it to something larger. Whilst WSCC could well turn down a future expansion, who can tell what a future planning appeal decision might bring?

Traffic volumes: The application estimates the lorry numbers to be about 240 hgvs a day ,but I understand that this is the same figure as that given when the earlier permission for a much smaller plant was granted. Using a scaling up from the earlier waste tonnage to the proposed 295000 tonnes per year (275000 + 20000 recycling) I would estimate that the daily number of lorries could well be much larger than the applicant's estimate of 240, to perhaps 400 hgvs each day onto a narrow, unclassified, country road. In addition there would be the ordinary vehicle movement of staff (40 people on 4 shifts per day) and the visitors which might include coaches for schoolchildren or other visitor groups. All of this makes the operator's traffic estimates look very questionable and could make the traffic impact very much heavier than they claim.

The applicant says that they will use much larger lorries to keep the vehicle numbers down but it must be questionable whether they can actually control the size of all the incoming vehicles, and in any event, who would want even larger lorries on what are essentially country lanes?

#### **4. Road access:**

The **only** road access suggested by the applicant (or indeed possible) is via the A259 and Church Lane./Ford Road. They make no proposals whatsoever to improve the local road infrastructure apart from improving the junction of their plant access road onto Ford Road.

Ford road/Church Lane is a single lane road which runs through the heart of Climping providing the main local route for private cars, cyclist, pedestrians and cyclists to the local church, playing field, two community halls and the local school, and of course the wider area.

The road currently has a 40mph speed limit which is constantly exceeded at off peak times (we have the speed monitoring figures to prove that with a maximum measured speed of an unbelievable 100mph recorded one afternoon). During the evening peak period the restricted capacity at the roundabout junction with A259 causes extensive southbound queuing in Church Lane which can extend as far back as Ford Prison and causes extensive delays and air pollution.

Church Lane currently has a single, narrow footpath only on the east side and no crossing facilities at all. When large commercial vehicles pass close by a pedestrian there is a frightening suction effect which makes it feel very unsafe. Cyclists also use the footpath as the narrow carriageway is not safe for them.

Then we have the dangerous junction of Church Lane with Horsemere Green Lane which is frequently used as a cut through by traffic going to the Rudford Estate and also by drivers wishing to avoid the dangerous junction at the Oyster Catcher. This junction is considered dangerous because of its poor visibility in either direction for vehicles emerging from HGL, combined with the potential speed of traffic on Church Lane. Most collisions that occur here are 'damage only' so are not recorded on official statistic, but there are plenty of them.

As members of the planning committee read these notes (as I hope they will) there can be little doubt about the unsuitability of the road as the main access to a new waste facility generating somewhere between 240 and 400 additional , large hgv's per day, or SOME 25 to 40 EVERY HOUR!

This factor alone should be enough to justify a refusal and yet the applicant concludes that Quote from NTS.153, " THIS IS NOT CONSIDERED TO BE SIGNIFICANT GIVEN THE LOW SENSITIVITY OF THE ROADS".

It's quite unbelievable really and is a good example of how this applicant is totally dismissive of anything that might stand in their way.

NB. I have also carried out a review of the WSCC Highways and Traffic Report on Impact of the previous application dated 11/08 2020. I produced a number of comments on its inadequacies in reaching its 'no objection' conclusion and will attach my review to be considered alongside this objection.

#### **5. Potential environmental impact:**

It is widely recognised that the incineration of all kinds of commercial waste produces a range of noxious gases and also highly toxic dioxins. The applicant stresses how their plant will have the latest technology to clean and filter out all of these things which are damaging to both humans and the environment they live in.

This maybe so, or it may not be, but it is apparent that a pair of 275 foot high chimneys is required to try and get the emissions away from the surrounding area. I suspect that wind and atmospheric changes could have quite an effect on that. And what would happen if there is a plant failure, maybe one that is not spotted straight away? Or if the monitoring is not quite up to scratch?

N.B. Beyond that the recent 'Dispatches' tv programme on Ch. 4 drew attention to how the incineration of waste to provide energy is now regarded as old technology and needs to be phased out as it is second only to coal in the amounts of emissions that it produces. They also highlighted how much of the collected 'recyclable' waste ends up being burnt because it is either contaminated or there is no outlet for it. This can be anything up to 40% of the 'recyclable' material. Thus large quantities of plastics go to incineration and produce some very toxic emissions.

They concluded that "Incineration should be a method of 'last resort' as it has become one of the dirtiest ways of creating new energy."

Clearly there are further questions to be raised on potential environmental impact and the Committee should ask itself, " why would you put a plant like this so close to many residential areas, including a new 1500 home site right next door?"

#### **Conclusion:**

I think it should be clear by now to all who read this that this vast new waste incinerator is totally unsuited to the location the its promoters have chosen for it. This is why I and so many others are objecting strongly to it on what I believe are solid planning reasons.

Any one of the above points ought to be enough for a rejection on their own, but considered all together the logical decision must be for a rejection. I do so hope we are not let down!

V1 16<sup>th</sup> April 2021