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Planning Department West Sussex County Council 2nd Floor Northleigh **County Hall** Chichester West Sussex PO19 10T Response made via the consultation portal

27<sup>th</sup> April 2021

Dear James Neave,

## WSCC/011/21 Proposed energy recovery facility at Ford Circular Technology Park, Ford Road, Ford

The application site is adjacent to a site allocated for mixed use including 1,500 homes in the adopted Arun Local Plan and Ford Neighbourhood Plan. CPRE Sussex assisted Ford Parish Council in considering this allocation with a 'Making Places' two - day community workshop in June 2018 to help inform the design principles. We are fully supportive of the Parish council's wish to create a 'heart' to their village and provide local affordable housing via their CLT. We hope that Ford village can become an outstanding example of how communities can work together to influence the creation of new places that enhance their surroundings and provide high quality living for future generations.

This new community is at risk from the effects of the proposed energy recovery facility which is substantially larger in scale than the one previously permitted on this site. An application was submitted in 2020 (WSCC/036/20) which CPRE objected to for the following reasons:

Its excessive size and design would be highly damaging to the immediate landscape and views from the South Downs National Park contrary to landscape and design policies in the Ford Neighbourhood Plan and Arun Local Plan and NPPF 170 and 172;

- It is contrary to national policy and guidance that the planning system should support the transition to a low carbon future in a changing climate. National Planning Practice Guidance describes the need to address climate change as "one of the core land use planning principles" that should "underpin both plan-making and decision-taking";
- It is contrary to the direction of travel set out in the Environment Bill which seeks to move our economy away from the 'take, make, use, throw' system to a more circular economic model that keeps resources in use for longer and ensures that we extract the maximum value we can from them;
- It could prejudice the delivery of the market housing on the adjacent allocated site because of the developer's concerns about the impact of the proposal on the sales value of dwellings; and
- It could prejudice the delivery of affordable housing on the adjacent site by the Community Land Trust.

This application was withdrawn in March 2021 and the current application submitted. The revisions are explained in the applicant's Design and Access Statement as follows: "The design development process sought to achieve a significant reduction in the height and mass of the buildings and an increase in space for landscape provision, with colours and materials that would help to reduce visual impacts".

The buildings have been sunk into the ground as far as groundwater levels allow but is still a large bulky structure with tall stacks which will remain prominent in both immediate and longer views. The buildings are proposed to be clad in light silver coloured steel, which the designers considered to blend the development when seen against the sky. However, the DAS accepts that in longer and more elevated views (such as from Arundel Castle and the National Park) the building will be seen against darker backgrounds and will therefore be more obtrusive. It is generally considered best to select colours that are slightly darker than the landscape around the new structure to help it recess into the background. The use of silver steel, even with a matt finish, is likely to significantly increase the impact of the building when seen in longer views.

CPRE Sussex therefore retains its objections to the impact of the development on the landscape. The other objections raised are unaffected by the proposed amendments and therefore are also retained.

Yours sincerely,

Kia Trainor
Director, CPRE Sussex

Kia Trainer