

Dear Sir/Madam.

Please see my comments and objections to the application WSCC/011/21, which is a new submission superseding withdrawn application WSCC/036/20. This is an application that follows the approval granted for application WSCC/096/13/F.

Most importantly, I would like to highlight a condition of the approval of application WSCC/096/13/F:

“Prior to the gasification plant being brought into use, the applicant shall submit, to the County Planning Authority, verification that the gasification plant has achieved R1 status from the Environment Agency at Stage 1 (i.e. the design information stage) of the R1 application process. Reason: To confirm the status of the gasification plant in order to ensure that the proposal would move waste up the waste hierarchy in accordance with PPS10 and to ensure compliance with Policy W10 of the West Sussex Waste Local Plan.”

Support was given for application WSCC/096/13/F on the grounds that it was for a gasification plant which complies with the County Council’s WLP..

<http://www2.westsussex.gov.uk/ds/cttee/plng/plng220714ucmins.pdf>

The latest application changes this site to an incinerator. An incinerator cannot achieve R1 status. Without R1 status this site is considered by the environment agency to be in the same waste management tier as landfill. As such, the latest proposal for this site (WSCC/011/21) does not meet the requirements for West Sussex to move waste up the waste management hierarchy and does not comply with the WLP.

R1 status for incinerators can be found below, this site has not even submitted an application:

<https://environment.data.gov.uk/portals/g/home/item.html?id=e9c43501928740f1a9cab6e5ca651dfb>

With regard to the environmental aspects, the facility should not be considered unless it is equivalent to the best technology available anywhere in the World. This means:

1. Requirement for mandatory best available technology (BAT) for the incinerator and its emissions control systems This should be validated by a recognised technical expert in the field. Requirements would be:
 - a. Maximum waste to energy efficiency (in other words it should do the best job possible and not be a tick-box exercise for WSCC and prioritising a profit opportunity for Grundon and Viridor)
 - b. No secondary emissions to be allowed from the site above current background levels* (this is full control of regulated emissions and demonstration of no increase in secondary emissions). This would be based upon an independent detailed survey of current background levels, and a literature review etc on performance of suitable waste-to-energy and emissions control technologies, and their primary and secondary emissions.

*Many emissions species have no safe limits for exposure, and the effectiveness of any candidate systems for reducing emissions should address all potential species. These would include, but not be limited to, nitrogenous species, sulphurous species, hydrocarbons, polyaromatics, dioxins and furans, volatile and non-volatile particles by number and by mass, metals and metal compounds of all types

With regard to the immediate environmental and health aspects, plus the impact of truck movements to and from the site:

2. No storage of ash/clinker on the site where wind and water could lead to contamination of surrounding areas
3. No storage of any flammable materials in such a manner as to present any risk of fire.
4. No storage of odorous organic materials except in hermetically sealed units. Plagues of seagulls already frequent the site, where Grundon has allowed stinking organic waste to be exposed to the air, attracting them.
5. Viability of the site should be predicated on the availability of sufficient quantities of high calorific value waste, thus limiting the number of truck movements. This must be sustainable for the lifetime of the facility. Currently available low calorific-value waste will require both more trucks and for those trucks to be coming from further afield, certainly beyond the boundaries of West Sussex. This facility is supposed to be part of a WSCC waste management strategy, not an excuse for polluting the environment indirectly.
 - a. It is not reasonable, or acceptable, to increase allowable truck movements to offset the unavailability of high calorific value fuel to be burned, as this results in increments of both greenhouse gases and pollutants from other sources. Increasing traffic flow to Ford Road further pollutes the local area around Nelson Row and Ford Road.
 - b. It is not environmentally sound to burn recyclables in order to justify and keep a facility such as the CTP financially viable. These materials may not be needed currently, or in the short-term of a post-COVID recession, but will be valuable and irreplaceable resources in the future.
 - c. No truck should be allowed to visit the site from outside the borders of West Sussex, nor staged deliveries be allowed (i.e. dropping waste from outside Sussex inside the county boundary) and then delivering it to site. A truck fleet driving millions of miles in the lifetime of the site to bring low calorific waste to Ford will generate huge quantities of unnecessary CO₂ emissions and pollutants, and have major negative environmental and health benefits.
 - d. Increasing truck movements will have a huge impact on the peace and quiet, air quality, personal mobility due to road congestion, and road safety in the area around the site. The roads will be further damaged by additional heavy-duty vehicles.
 - e. CO₂ emissions are a global issue, leading to global warming, and the CO₂ from the preparation of materials for shipping and combustion, delivery to site, and operation of the site should be added to the county's carbon budget and properly justified.
 - i. A comprehensive environmental audit of the site should be undertaken, and a net environmental benefit proven
 - ii. There should be a plan for the total CO₂ output from the site to be offset by tree-planting or otherwise captured and nullified. Other greenhouse agents such as methane, nitrous oxide and black carbon should also be quantified and accounted, and draconian fines levied if the site is not wholly carbon-neutral.
 - f. Exhaust pollutants will impact the health of local residents. All trucks that service the site, Grundon, Viridor, and sub-contractors, must be equipped with best available technology particulate and NO_x emissions control devices, so of Euro VI-D or E standard, to efficiently limit emissions under the duty cycles encountered on and immediately around the site. All commercial light-duty vehicles should be Euro 6d-

temp or later standards, alternatively PHEV or full electric vehicles, of an equivalent standard.

- i. The close proximity, approximately 15m, of Nelson Row housing to Ford Road already exposes residents to instantaneous high levels of pollutants as trucks pass, and the proposed new routing of trucks will magnify this problem. High levels of NO₂ emissions are present from Euro IV, V and early Euro VI vehicles. Even if site vehicles are restricted to the cleanest technologies, maximum emissions still occur during the first 1-2km of a vehicle's journey, meaning highest exposures for Nelson Row residents. The death of Ella Kisse-Debra from roadside air pollution in Lewisham has made global headlines and set a legal precedent. Her home was 30m from the main road.
 - ii. Emissions from coarse particle emissions from brakes and tyres are considered to be one of the greatest threats to public health. Brake particle emissions will be controlled within the forthcoming Euro 7 regulations. The high level of laden truck and other vehicle movements will impose a local environment, particularly around Nelson Row and Rodney Crescent, that exposes residents to high levels of toxic brake and tyre wear, plus leading to resuspended dust (see 2 above). There are residents in the Nelson Row / Rodney Crescent areas who suffer from respiratory ailments who will suffer if this planning application is approved.
- g. Noise pollution is already a significant issue at Nelson Row. The high levels of truck movements in Ford Road create a high noise background, and trucks accelerating as they leave the Viridor and Southern water sites lead to extreme engine noise. The significant deterioration in the road surface of Ford Road through all the truck movements, and the poor quality of the surface, leads to high tyre noise. Degradation of the road, and the production of potholes around manholes and access covers, leads to constant thumping as vehicles pass along Ford Road. Increasing truck movements will increase traffic noise, increase road wear, accelerate the creation of pot-holes and significantly increase noise beyond current levels.

With regard to despoiling of the local area, beauty of the south coast, views from South Downs and damage to the views from the Arun river and Climping gap:

6. Trucks travelling to and from Viridor currently shed litter to a completely unacceptable degree, filling gardens and driveways with tins, paper, plastic waste and discarded face masks. This spoils the living environment of residents. Additional trucks delivering waste to a Viridor-Grundon facility will worsen this situation.
7. The planned height of the building and chimney stack will cause extensive damage to local views including those both to and from the National Park. No high-rise dwellings have been approved in the area in several decades, so this building would set an extreme precedent.
8. There is also a high risk of a large visible plume, when weather conditions lead to water vapour condensation, which will lead to significant anxiety of local residents in the downwind area, as well as creating a terrible eyesore in the locality, and from the national park. This plume could be huge and visible for tens of miles.
9. The fallout from the stack will impact many densely populated areas to the east, and the consultation should be mandatorily extended to Littlehampton, Worthing etc who are downwind of the facility, given the prevailing westerly winds. The limited reduction of the stack height proposed in the new application increases the risk of the plume grounding,

potentially even at the site of a local resident's property, directly exposing locals to emitted toxins.

Best regards,

Dr Nicola Wilson