

Comment for planning application WSCC/011/21

Application number	WSCC/011/21
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Type of Comment	Objection

Comments

Objection I object to this enormous incinerator development at Ford, The National Planning Guidelines 148. The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure. This application fails this test. NPG 172. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. A building of this size and height with massive chimneys is clearly an eyesore from the Southdown National Park and Historic Arundel. It will be a massive intrusion to any view from the riverside walks along the River Arun. Historic buildings and their contents could also be at risk from increased emissions from the incinerator in the area of fallout from the combustion process. Mis-information by WSCC Ford Parish Council first objected to this development in 2014. After West Sussex County Council approved the application the following information below in italics was given to Ford Parish Council by Michael Elkington (Strategic Planning Manager, Residents' Services Directorate) when granting planning permission at the Grundon site. After the meeting you asked about the recent planning permission for the waste management facility at Ford. In your discussions with local residents, it is particularly important that they understand the 'fallback' position for the site which is as follows: In September 2013, Arun District Council approved three Lawful Development Certificates (LDC) for the whole site within the Grundon's control (i.e. the application site together with the two hangers to the north). The LDCs confirmed that the aerated block factory on the site has an established Class B2 (General Industrial) use. Therefore, planning permission is not required for the buildings on the site to be used for general industrial use and operations on the site can take place for 24 hours a day, seven days a week. Under the LDCs, Heavy Goods Vehicle (HGV) movements associated with the established Class B2 use cannot take place between the hours of 20:00 and 06:00. However, there are no restrictions under the LDCs on: (a) the means of access; (b) the number of HGVs (which could be in the region of 70 to 222 HGV movements a day); and (c) the routing of the HGVs to and from the site. The recent planning application by Grundon provided the opportunity to exercise a greater degree of control over the site than is possible under the LDCs. Accordingly, the planning permission granted by the Planning Committee, which will control the means of access, will be accompanied by a s106 legal agreement for the whole site that will: (i) restrict HGV movements to and from the site to between 07:30 and 17:00 Monday to Friday and 08:00 and 13:00 Saturdays; (ii) limit the total number of HGV movements for the whole of the site to no more than 120 HGV movements a day (60 in and 60 out); and (iii) prevent associated vehicular movements on the immediate road network to the north. Overall, therefore, the planning permission for the waste management facility is considered to be a 'betterment' for local residents and the local environment, as it will have greater controls over HGVs hours, numbers, and routing than are currently in place under the LDCs. This assurance provided by West Sussex County Council were false and Grundon's intentions to increase the HGV traffic and change the restrictions soon progressed. The Parish now question the intentions of Grundon's from the start. Were we misled? No plant was built when they had permission for HGV'60 in 60 out. They applied for an increase to 120 in 120 out notwithstanding local objections it was approved. Now they apply for a much larger plant to burn 275,000 tonnes. Phillip Atkinson Estate Director, Grundon Waste Management stated at a meeting on 4/5/20 to a question from Dan Montagnani as to why the original consent was not taken forward by Grundon? "The decision not to proceed was based on economics and feasibility. Delivering the consented scheme wouldn't be impossible but the proposed new facilities would be more efficient and therefore preferable" Five years with consent for the smaller scheme and nothing done. Why? We will now move to our next points. The application does not comply with the Ford Neighbourhood Plan Development Policies. Since 2012 Ford Neighbourhood team have been working towards a 'village development' and agreed a plan of 1545 homes on this site 30% of which are affordable. It includes a two-form entry primary school and large Community Building. Siting a massively increased incinerator and generator, operating over a 24 hour period with noise and light pollution is not compatible with housing. Although the Government's intention for a Neighbourhood Plan is for local people to decide what goes on in their villages/towns, the Localism Act sets out some important guidance. One of these is that all Neighbourhood Plans must be in line with higher level planning policy. That is, that Plans must be in line with: National Planning Policy Framework (NPPF) Arun District Council (ADC) Local Plan 2003 West Sussex Waste Local Plan 2014 West Sussex Minerals Local Plan 2003 European Regulations on key environmental aspects Our

Plan has been developed through consultation with the people of Ford and others with an interest in the Parish. Details of the consultations have been recorded on the Parish Council and ADC web site The Plan provides a vision for the future of the Parish and sets out clear policies and objectives to realise these visions. These policies accord with higher level planning policy, principally the NPPF, the West Sussex Structure Plan and the ADC Local Plan 2003, as required by the Localism Act. Once approved, the Neighbourhood Plan forms part of the Arun District Council Development Plan. During this time the Neighbourhood Planning Team took into consideration how the Neighbourhood Plan fits with the Planning System and existing/proposed premises. As required by law all consultations were undertaken. WSCC made no objection to the Ford Neighbourhood Plan Policies and the Government Inspector approved the plan.

6.3 A Spatial Plan for Ford Policy SP1 Spatial Plan for the Parish Development proposals of a minimum of 1545 new dwellings and supporting infrastructure and village centre community facilities will be supported provided that they are sited within the settlement boundary of the built-up area as defined on the Proposals Map. Proposals for the Ford airfield site must be part of a comprehensive Masterplan as required by Policy H SP2 of the Arun Local Plan. SP1.1 The policy supports development on land within the settlement boundary but only if it is considered to be suitable for development against other Plan policies. SP1.2 Maintaining a gap between the settlements of Ford and Yapton is considered important. Justification : NPPF 6,11; Obj 1,3 Policy SA1 Ford Airfield The area shown on the Proposals Map as SA1 shall be developed in a comprehensive and coherent manner in accordance with all the policies set out in the Arun Local Plan and in particular Policy HSP2 and Policy SD8. In addition to meeting these requirements, the master plan will be expected to: - provide that the layout of pedestrian footways, cycleways roads should provide a sense of orientation as well as a sense of place. local areas for play shall include areas designed as "village greens" as well as sports pitches. the proposed community hub shall include the provision of a community hall. the mix of residential units shall include accommodation for the elderly. the new healthcare facilities shall be provided on site as part of development rather than the development being expected to make a financial contribution to healthcare facilities elsewhere. the master plan shall incorporate a network of open spaces, which shall include parks and gardens, natural and semi-natural green space, amenity space (including village greens), sports pitches, children and young persons' play spaces and allotments, all connected via a network of footpath and cycleways that will link the new and existing community to new facilities. existing mature vegetation shall be retained where possible. where required, following detailed highway assessment, the development will deliver any required road improvements to Ford Lane, or Horsemere Green Lane and Yapton Road. The design of the detailed master plan should be prepared following community engagement through workshops with the local community and stakeholders. Part or 29 all of the development and associated infrastructure maybe delivered through a community land trust. Justification : NPPF 6 : Obj 1 The Neighbourhood Plan was developed by the members of the Parish and surrounding Parishes over a eight year period. At all stages we considered the existing sites and their planning permissions, a difficult task when dealing with a Prison, MRF recycling plant, water treatment site gasification site (granted consent in 2015 but never built) and two factory sites. The community further worked together to form a Community land Trust to ensure affordable housing went to the local community and partnered with a major Housing Association. This is now under threat because if the incinerator site is allowed to expand the houses will not be available because of the sites limitations, size and complications. Policy EH2: Renewable Energy Proposals for energy generating infrastructure using renewable or low carbon energy sources to serve individual properties or groups of properties will be supported provided that: The energy generating infrastructure is located as close as practicable and is in proportion to the scale of the existing buildings or proposed development it is intended to serve The siting, scale, design and impact on heritage assets, landscape, views and wildlife of the energy generating infrastructure is minimised and does not compromise public safety and allows continued safe use of public rights of way Huge oversized building that has massive impact on landscape. Policy 6.7 Employment and Enterprise Policy EE1 Support for business Development proposals to upgrade or extend existing employment buildings (see Evidence Base 12) will be supported unless the proposal would cause unacceptable harm to the amenities of surrounding properties, landscape, wildlife and cultural heritage. NPPF 1,3 ; Obj 8 Clearly a gigantic oversized development for the landscape Policy EE10 Quality of Design of commercial buildings Proposals for new or extension or alteration of existing commercial premises must be of high quality design, be energy efficient and designed to be in harmony with the landscape setting and contribute positively to the environment. EE10.1 To ensure that development and materials respect the local character and location. Justification : NPPF 7; Obj 2 Clearly this buildings design is not in harmony with the landscape. Our objections now centre on the new Government Environmental Bill. We believe that the proposal for increased burning of waste to 275,000 tonnes at the site breaches the intentions in the bill. The Environment Bill makes a clear commitment to set an ambitious, legally binding target for the pollutant with the most significant impact on human health, fine particulate matter which results from incineration and the application should be suspended until the conditions being made law are confirmed by Parliament and the application is reviewed using the new guidelines. As Grundon has not sought to implement its current plans there is obviously no urgent need to determine the application and long-term environmental damage can be prevented. Over its lifetime, a typical waste incinerator built in 2020 would release the equivalent of around 1.6 million tonnes of CO2 more than sending the same waste to landfill. Even when electricity generation is taken into account, each tonne of plastic burned at that incinerator would result in the release of around 1.43 tonnes of fossil CO2. Due to the progressive decarbonisation of the electricity supply, incinerators built after 2020 would have a relatively greater adverse climate change impact. (UKwin) Rampion Offshore Wind

Farm is now generating enough green electricity to power the equivalent of around 350,000 UK homes and is expanding providing more clean energy. The resources and waste measures in the Bill will help move our economy away from the 'take, make, use, throw' system to a more circular economic model. Government ambition is to keep resources in use for longer and ensure that we extract the maximum value we can from them. The Environment Bill introduces a series of measures that will fundamentally change the way government, businesses and individuals produce and consume products. The Environment Bill helps consumers to make purchasing decisions that support the market for more sustainable products. It contains powers to introduce clear product labelling, which will enable consumers to identify products that are more durable, repairable and recyclable and will inform them on how to dispose of used products. Government clauses will also enable us to set minimum ecodesign requirements for products and require provision of information to buyers of products and materials to support a shift towards durable, repairable and recyclable products, and banning those products or packaging which cannot be reused or recycled (where appropriate). New government powers to set resource-efficiency standards for products will help drive a shift in the market towards products that can be more easily recycled, as well as products that last longer and which can be re-used and repaired more easily. Powers in the Environment Bill to introduce new extended producer responsibility schemes will enable us to reform our existing producer responsibility arrangements and introduce new schemes in the future. Extended producer responsibility schemes seek to make producers responsible for the full net costs of managing their products at end of life. The powers provide for modulated fees that incentivise producers to design their products with re-use and recycling in mind, as those that make their products easier to recycle will pay less. Government will also modernise the government's existing powers to set producer responsibility obligations, extending them to the prevention of waste and redistribution of surplus products and materials. To continue reducing plastic pollution across the country, the Environment Bill will enable the creation of new charges for other single-use plastic items, similar to the carrier bag charge, which will incentivise a shift towards the use of more reusable items. Government are also taking powers to establish deposit return schemes that further incentivise consumers to reduce litter and recycle more. To support citizens' efforts to recycle more, the Environment Bill stipulates a consistent set of materials that must be collected from all households and businesses, including food waste. This will help make services more consistent across the country. The Bill also sets out how government will mandate weekly collections of food waste for every household, subject to consultation. Everyone has a role to play in changing the way we act in order to ensure we have a cleaner, healthier environment. The Environment Bill will deliver public health benefits by addressing air pollution, which is the greatest environmental risk to our health. Poor air quality contributes to serious chronic illnesses, shortening lifespans and damaging quality of life for many people. Pollution also has major impacts both on the natural world and the state of the economy. The UK has long been determined to improve air quality. Having adopted legally binding international targets to reduce overall national emissions of five key air pollutants by 2020 and 2030. Our tough regulatory frameworks have yielded significant progress to date. And in January 2019 Government published our Clean Air Strategy, which was commended by the World Health Organisation. However, we still need to go further, which is why we are taking forward ambitious measures through the Environment Bill. The Environment Bill makes a clear commitment to set an ambitious, legally binding target for the pollutant with the most significant impact on human health, fine particulate matter. Reductions in this pollutant will deliver significant benefits to public health and technological advancements, resulting in benefits for the economy. Ford Parish also have concerns over West Sussex Waste Local Plan The Waste Local Plan was subject to a 5-year review in 2019, as required by national policy. The purpose of this review was to assess whether the plan remains relevant and effective, or if changes are required by way of updates to the plan. Your outcome of the review undertaken in 2019 is that the plan remains relevant and effective; therefore, no update is required at this time. We challenge that view as the new Environment Bill will require you to make changes to comply with its purpose. We believe that as important developments/plans are agreed It should be continuously monitored to ensure any planning applications are relevant to the environmental needs of the County and over . An early review should be triggered as substantial changes occur (Horsham Incinerator). Why would WSCC be negligent and exacerbate overcapacity at the expense of opportunities to improve recycling. We question if the current strategy is relevant regarding the incineration of waste in the County and the changes the Governments Bill requires. Ford Parish also believes that now the Government Inspector has granted the application for the Horsham Incinerator it should trigger a review of the Strategy to assess whether the additional incinerator facilities are essential . Lastly may we remind you that the site has planning permission for a gasification-type incinerator approved in July 2014 (ref WSCC/096/13/F), with decision notice issued in January 2015. Planning consent includes a planning condition requiring a design-stage R1 certificate before the facility can be brought into use [Source]. We consider this an essential part of any consent. Once the plant design is known Grundon can submit an application based on design data. They can apply before the plant has been commissioned including before seeking planning approval or apply for an environmental permit. We will end with this:- 22/7/2020 Prime Minister Boris Johnson has announced a 350m funding package today (July 22) to support the green economy and tackle climate change. The investment will support the UK's ambitions to reach net zero by 2050 by funding the decarbonisation of the heavy industry, construction, space and transport and stimulating green innovation. Projects set to benefit from the funding including those working on using data more effectively to tackle climate change, helping companies to be more energy efficient and driving the creation of green jobs in UK industries. Today will also see the first of the Jet Zero Council meetings, uniting Government, industry leaders and

environmental sector representatives to work on developing the first ever zero emission long-haul passenger plane. Prime Minister Boris Johnson said: "We've made great strides towards our net zero target over the last year, but it's more important than ever that we keep up the pace of change to fuel a green, sustainable recovery as we rebuild from the pandemic. "The UK now has a huge opportunity to cement its place at the vanguard of green innovation, setting an example worldwide while growing the economy and creating new jobs. Now an announcement has been made (April 2021) for a more urgent reduction in carbon emissions by the Prime Minister, this site will greatly increase carbon pollution. I therefore object to the planning application.

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Attachments