

## WSCC/011/21: Ford Energy Recovery Facility

I wish to raise an **objection** to the above planning application.

I **strongly support** the **objection** raised by Walberton Parish Council concerning this application.

My reasoning for objecting are as follows.

Requirement for the site. West Sussex County Council Waste Local Plan (WLP)

### Visual impact on the local area

- The site is within 400m of housing in Yapton.
- Other existing houses in Ford are closer still (under 300m from the site)
- Walberton Parish's boundary is less than 2 miles from the site. The land between Walberton and the site is relatively flat and the elevations are very similar.
- The view from the South Downs National Park (SDNP), with the Downs at a higher elevation than Ford, will be considerably impacted by the proposed facility.
- Ford Parish Council's Neighbourhood Plan Policy SA1 represents a Ford Airfield development of 1500 houses which will be adjacent to the proposed site. This site is included in Arun District Council (ADC)'s Local Plan (policy SD8). We cannot believe that anyone would want to buy a house next to this proposed facility thereby potentially putting Arun's housing land supply in an even worse position than it currently is.
- This is reflected by the "new ghost town" that has been created on the northern edge of Walberton, where the new Lindern Home estate has been abandoned by the developer and those unfortunate enough to have completed on their purchase. All because of the vastly unpopular and environmentally damaging A27 Grey route. To build new housing developments is one thing, but for them to turn into unwanted and unsellable homes by their proximity to a manmade, environmentally damaging eye sore, is a disgrace!
- WLP Policy W11 states, "Proposals for waste development will be permitted provided that they would not have an unacceptable impact on (a) the character, distinctiveness, and sense of place of the different areas of the County and that they reflect and, where possible, reinforce the character of the main natural character areas (including the retention of important features or characteristics)." This is certainly not the case in this context.
- Further, we note conflict with WLP Policy W12b requiring any development to "have regard to the local context including:
  - the varied traditions and character of the different parts of West Sussex;
  - the characteristics of the site in terms of topography, and natural and manmade features;
  - the topography, landscape, townscape, streetscape and skyline of the surrounding area;
  - views into and out of the site; and the use of materials and building styles.
  - The visual impact of the proposed development is also contrary to Clymping Neighbourhood Plan Policy CPN7 - Protection of Open Views.

**An 85m Dual Chimney Stack – just 2 houses shorter than the chimneys at Battersea Power Station - and a 38.5m tall building will have a significant visual impact on the neighbouring properties even without considering any smoke plume. It will also be visible from Walberton Parish as it will be above the horizon (3 miles away at sea level) as a major blot on our landscape.**

## Environment

The prevailing wind for the area is from the south-west (West Sussex Life 2014 p 118, pub. West Sussex County Council). This will bring gaseous discharges towards Arundel and the South Downs National Park.

The developer provides a report with predicted air quality impacts.

- In some places the report lists a number of different Receptors at which impacts are predicted.
- It is noted that even Walberton Parish (Receptor 24) is predicted to receive an amount of pollution from the site.
- Heavy metal pollutants are only considered at 'the point of maximum impact' with reference to an Air Quality Assessment Level (AQAL).
- Arsenic is noted to exceed AQAL
- **Chromium (VI) is noted to exceed AQAL by in excess of 2500%**
- It is highly desirable to know the level of toxic metals predicted at the various sites rather than just the point of maximum impact, for example the nearby Local Primary School (Receptor 10 – Yapton Primary School) and the proposed Arun District Council Secondary School site (Receptor 20).
  - It is my understanding of the document is that comparison is made to an unidentified 'currently permitted facility'. I am concerned that this vague reference means that comparison may not be taking place with a state-of-the-art plant built to the latest exacting emissions standards and could be another substandard but still operating plant chosen to improve the figures presented.
  - Given the variable quality and nature of the fuel used (as household waste is of variable type), exact prediction of the issues is challenging and in the worst-case scenario may be underestimated.
  - The sustainability of incineration is second last in the hierarchy of waste handling processes. Noting the approved increase in capacity at Horsham, adding yet more incineration is in conflict with WLP Strategic Objective 14, "To minimise carbon emissions and to adapt to, and to mitigate the potential adverse impacts of, climate change."

## Conflict with existing planning policies

The proposed development appears to be in conflict with a range of planning policies, both local and national.

- Walberton Neighbourhood Plan 2020, Policy VE13 (Protected Views and Vistas)
- The site impacts protected views 2 and 3. The 2020 Plan was confirmed by referendum on 6<sup>th</sup> May 2021 and so is considered to be applicable to any planning decisions from that date.
- National Planning Policy Framework (NPPF) paragraph 148: "The planning system should support the transition to a low carbon future ... shape places in ways that contribute to radical reductions in greenhouse gas emissions"
- NPPF paragraph 172: "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks..." This impacts adversely on the scenic beauty of the SDNP as described above.
- SDNP - H1.11 Policy LAND M1 (Protection of Landscape Character): "**Development within the setting of the South Downs National Park must have special regard to the conservation of that setting, including views into and out of the Park, and will not be permitted where there would be harmful effects on these considerations.**"

It is noted the reference to views out of the Park which will be adversely impacted.

- Ford Parish Council's made Neighbourhood Plan Policy SA1 (Ford Airfield) Provides for 1500 dwellings, play spaces and allotments. An incinerator immediately adjacent will compromise the quality of this key local development.

Note the dwellings allocated under this policy put the siting of an incinerator here in conflict with WLP Policy W12a, "to integrate with and, where possible, enhance adjoining land-uses and minimise potential conflicts between land-uses and activities"

Policy EH2 (Renewable Energy): *"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"*

The size of this proposal **will** impact significantly on landscape and views.

Public safety may be impacted by pollution. Policy EE1 (Support for Business Development): *"Development proposals to upgrade or extend existing employment buildings ... will be supported unless the proposal would cause unacceptable harm to the amenities of surrounding properties, landscape ..."*

I strongly consider the potential harm to the landscape to be unacceptable.

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."*

I consider the environmental contribution to be negative and the proposal not to be in harmony with the landscape setting.

Policy SP1 (Spatial Plan for the Parish)

- SP1.1: "supports development on land within the settlement boundary but only if it is considered to be suitable for development against other Plan policies."
- ADC Local Plan Policy H SP2, relating in part to Ford NP Policy SA1: "c. Protects, conserves or enhances the natural environment, landscapes and biodiversity."

**This development is unlikely to provide such an enhancement.**

## Traffic and Transport

The site presents a number of potential traffic issues.

The stated level of HGV movements is 120 in and 120 out per day. This gives 240 HGV movements per 14 hour period or 1 movement every 3.5 minutes. Immediate local roads are minor and the A259 to the south is already busy. The plan is for 275,000 tonnes of waste to be handled per year, a considerable amount.

This is ON TOP of the current vehicle volume on our local roads. This is not acceptable.

The North End Road (North of Ford Lane) traffic is shown as increasing yet the HGV is increase is

forecast to be zero. Yapton Lane, which is the continuation of North End Road north of the level crossing in Walberton Parish, has about 4% HGV traffic.

Three of the possible offline A27 Arundel bypass routes cross the top of Walberton Parish enabling easy access to the A27. I therefore believe that the HGV increase on Yapton Lane will be considerable.

- There will be added conflict with the extra traffic from the new housing estate – 1500 houses could give 3000 extra cars to conflict with these HGV movements.
- HGVs generate more pollution – including noise and diesel particulates - near to residential areas. It should therefore be considered that there is no Government plan supporting the electrification of HGV's
- No mitigations for the impact of construction or operational traffic on residents or other road users have been proposed despite the requirements of Clymping Neighbourhood Plan Policy CPN 14 - Traffic and the Environment.
- The proposed A259 / Church Lane roundabout change – widening the westerly A259 entrance - will not be fit for the intended purpose. CM/1/17/OUT and the WSCC A259 Options Study are relevant here.
- HGV movements along Church Lane will generate vibration. This will have an adverse impact on Grade I and II buildings and would therefore fall foul of WLP Policy W15 – Historic Environment.
- The location of the site is poor in terms of transport sustainability.
- All waste movements will be by road which is contrary to WLP Strategic Objective 7 “to maximise the use of rail and water transport for the movement of waste and to minimise lorry movements and the use of local roads for the movement of waste.”
- The proposal is also in conflict with WLP Policy W18.

### Major incident safety

There will be quantities of household waste stored on the site while it is sorted and processed. There have been a number of fires at Household Waste Recycling Centres linked with the presence of lithium batteries, not uncommonly found in household waste despite advice being to separate batteries from devices before disposal.

UK fire and rescue services “attend around 300 significant fires in waste sites each year.” (UK National Fire Chiefs Council, Fire Central Programme Office, <https://www.ukfrs.com/guidance/fires-waste-sites>)

**A fire immediately next door to the new Ford Airfield housing estate will result in major issues with hazardous fumes. The results of the recent Westhampnett Recycling Centre experience are noted; these fires can be difficult to extinguish.**

The presence of chemical and fuel stores on site (ammonia and diesel) increases concern should there be a major incident.

The existence of this perceived risk is in conflict with WLP Policy W19 – Public Health and Amenity. (sent unsigned by email)

James Harris

11<sup>th</sup> May 2021.