

West Sussex County Council (James Neave)	Our Ref:	SDNP/21/02213/ADJAUT
	Contact Officer:	Kelly Porter
	Tel. No.:	01730 819314

12th May 2021

Dear Sir/Madam,

Neighbouring Authority Consultation

Applicant Name: West Sussex County Council (James Neave)

Proposal: Adjoining Authority Consultation from WSCC - Case Ref: WSCC/011/21 - Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding, and landscape works.

Address: Ford Circular Technology Park, , Ford Road, , Ford BN18 0XL,

Thank you for your correspondence received 13 April 2021, consulting us as a neighbouring authority on the above noted development proposals.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination. The statutory purposes and duty of the National Park are:

- **Purpose 1:** To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- **Purpose 2:** To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- **Duty:** To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

The National Park's comments on the development are as follows:

As set out in our comments on the previous application (WSCC/036/20), at the present time, we are objecting to the proposal given its impact on the Statutory Purposes of the South Downs National Park and its special qualities.

Please note our comments below are focused on the landscape and visual impacts of the proposal, we will leave it to West Sussex County Council to determine the acceptability of other potential impacts, such as air quality and impacts to public rights of way and highways.

We acknowledge that this site is allocated for such a use in the adopted Waste Local Plan and safeguarded in the adopted Arun Local Plan and we did not object to permission WSCC/096/13/F for a smaller building than that now proposed. In addition, we acknowledge, the surrounding land is also allocated as Strategic Housing Site in the adopted Arun Local Plan (and is currently subject to an application F/4/20/OUT to Arun District Council).

We do accept that any new development in this area will have an urbanising impact on the wider landscape and that this needs to be considered alongside the need for such a facility but this application is proposing a large ERF building and stack (with the ERF building up to 16.5m higher and the stack 35m higher than the permitted scheme). This additional height and bulk is considerable and, in our view, causes harm.

We agree with the conclusions of the submitted Environmental Statement (and in particular the LVIA) that this proposal will have adverse impacts on views and experiential qualities of the National Park and its setting. For example, the proposal will be highly visible in panoramic views of the Arun Valley / coastal plain from a National Trail (the South Downs Way) and other public rights of way across the National Park. In our view the adverse impacts will be significant.

We note that the applicant has sought to mitigate the impacts by proposing the ERF building (and associated buildings) is sunk into the ground as far as the groundwater levels allow and have sought to alter the form / design of the building and proposed colours from the previous application. However, we do not agree with the conclusion that due to its more simple built form and the lighter colours proposed for the building materials, that this impact is acceptable.

The submitted Design and Access Statement, accepts that in longer and more elevated views (such as those from the National Park), that despite the use of the proposed matt metallic 'silver' materials to clad the building(s), it will be seen against darker backgrounds and will be more obtrusive.

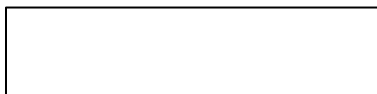
As stated, we accept that the neighbouring Strategic Housing Site will also have an impact on the National Park (particularly in the panoramic views of the Arun Valley / coastal plain), however, it is the combination of the scale, height, bulk (in particular) and colour choices of this proposal which is creating the unacceptable adverse impacts.

We do not believe that sufficient consideration has been given to all the mitigation measures to reduce the adverse impacts to the National Park and in harmonising this proposal with the landscape.

As per our comments on the previous proposal, in addition to exploring further a reduction in scale and height of the building(s) and stack, other measures to reduce the visual impact should also be considered. Further consideration should be given to the use of 'green / living' walls (which would have the added benefit of enhancing the biodiversity / ecology of the site). The use of living walls on such a facility is possible, as shown on facilities owned / managed by Veolia (for example, the Recycling and Energy Recovery Facility in Leeds).

We would also like to reiterate that under Section 62 of the Environment Act 1995, the need for West Sussex County Council to meet the legal requirement to have regard to the statutory purposes of the National Park in determining this application.

Yours faithfully



TIM SLANEY
Director of Planning

South Downs National Park Authority

Contact Officer

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