

Comment for planning application WSCC/011/21

Application number

WSCC/011/21

Name

Peter & Pauline Ladd

Address

STATION ROAD, 3, STATION ROAD, ARUNDEL, BN18 0BJ

Type of Comment

Objection

Comments

Dear Planning Committee, We wish to lodge our objection to the planning application by Ford Energy from Waste/Grundon Waste Management/Viridor Energy for the proposed 'Ford energy from waste' site, application no. WSCC/011/21. It is disappointing to note that yet again the applicant has not presented a public exhibition and thus the local community have not been able to fully assess the true scale of this application and the probable detrimental effect on the local landscape, surrounding area and community. The application has been lodged during a period of national lockdown as a result of the Covid-19 pandemic and therefore the community has been denied the opportunity to hold any public meetings to discuss this significant application before the closing date. Although there were signposts to the website via a mailing from the applicants, many in the community would not have been able to access the information. In fact, the number of documents and supporting documents is so vast that members of the general public would find it difficult to navigate the complex plans and statements available. Emissions from the stacks from the proposed facility would directly impact the residents of Ford Lane and Station Road being in the highest concentration of emissions from the stacks as detailed in ES_TA_C_Air_quality_Part_3_Emissions_Modelling document. This area also contains the busy camp site which helps boost the local economy. To quote Aidan Farrow, a researcher at the Greenpeace International Science Unit: "There's really strong evidence that even small increases in particulate pollution can have a measurable impact on health...Anything that is going to produce more air pollution in places where people are going to breathe it, there will be a health impact." It has been proven that the smallest particles which emit from these stacks like an aerosol can pass into the blood and airways of people and are known to cause significant breathing problems as well as heart and lung disease. This area also includes the Ancient woodland at Ford and tidal River Arun causing irrevocable damage to our waterways, wildlife and fauna. Whilst emissions from incinerators have not been included in the UK Emissions Trading Scheme, the evidence from the Eunomia report, commissioned by the environmental law charity Client Earth, one of UK's leading environmental consultancies, raises major concerns over future emissions from incinerators. o Producing electricity from waste is more carbon intensive than producing it from gas - and second only to coal. o When coal is phased out, incineration will become the dirtiest form of electricity production in the UK o The analysis found that over the next 15 years there'll be a big change in the make-up of our waste stream, there'll be less materials like cardboard, paper and food waste because new regulations mean more of those will be recycled and composted. o Every tonne of waste sent for incineration will contain a higher proportion of plastics. o By 2035 incineration will become a more carbon intensive process than even landfill. The proposed elevations of the buildings under this application are wholly disproportionate for the existing residential, light industry and the impending plan for 1500 new homes on the airfield. Under the National Planning Policy Framework, paragraph 127(b) planning applications "are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;" In their Main Supporting Document Section 3.4 the developers acknowledge that "due to the setting of the site and the scale of the development it would be impossible for it to be 'hidden'. In giving due consideration to its surroundings and context it would be important for it to be designed to best mitigate its visual impact, and through high quality design make a positive contribution to the character and quality of the area". Whilst it is acknowledged that an attempt to improve the design, landscape and screening for this application has been offered, no amount of landscaping could enhance or screen a commercial building of this magnitude. The Boiler Hall Parapet is twice the height of the roof of Chichester Cathedral with the stacks still higher than the Cathedral spire. The building and chimneys would be clearly visible from our home and the wider surrounding area including the historic town of Arundel and the South Downs. We would challenge the developers claim that the 'Degree of Effect on Landscape & Visual to the north & north-east' is only moderate-substantial, substantial-severe is a more realistic evaluation. Whilst there are measures for traffic movements of HGV's inside the site for this application, we are concerned at the increase in traffic this will undoubtedly bring and the adverse effect on the local community. Results listed on Table 15.9: Comparison of AADT-24 vehicle flows for the 2026 Opening Year DN and DS scenarios in ES Chapter 15 Traffic and Transport is based on the period October 2019 to January 2020 and we would argue that this is does not represent the true number of HGV's over a year. Indeed with the size of this application, the number of HGV's arriving/departing from the site would increase significantly. The local road network is already suffering with the number of HGV's using these minor roads and with a site operating 24/7 there cannot fail to be a significant increase in HGV and associated traffic. In turn, the number of HGV's on these roads will result in a big increase in traffic noise and pollution. There are proposals for mitigation of these factors but they will have no significant impact on the overall pollution caused by the increase in traffic, in

particular HGV's. Arun District Council in conjunction with West Sussex County Council are trialling a new recycling scheme in Littlehampton which, if successful, will be rolled out across the County. This would be positive step in improving recycling rates and thus reducing the need for incineration and landfill. The other premise for this proposed development is that it will produce electricity for the community. However to make the production of power financially viable, more waste is required and as WSCC have approved an incinerator at Horsham to deal with the Counties waste, it is highly probable that the waste at this proposed Ford site would be from other parts of the country. There are cleaner methods to incineration to produce power as in the proposal to extend the off-shore Rampion Wind farm to Climping. In conclusion, this application should be refused on the basis that not only is it in a highly unsuitable location, environmentally and health damaging but also that it is unnecessary. This is purely a profit generating commercial venture under the guise of an environmental need. Peter & Pauline Ladd

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Attachments