

14 Navigation Drive  
Yapton  
Arundel  
BN18 0FS  
15 May 2021

Dear Sir,

**WSSC/011/21: Ford Circular Technology Park, Ford Road, Ford BN18 0XL**

I object to this development entirely. There are no possible mitigations or enhancements that could make it in any way acceptable.

This is a massive new development. While the applicant has had planning permission granted for a waste management development on this site in the past it is key to note that:

- this permission has expired as development did not commence within the three year time limit
- this (now expired) permission was for a substantially smaller development
- this (now expired) permission was considered before the approval of the Ford Neighbourhood Plan, the masterplan for “The Landings”, and the related outline planning permission for 1,500 homes, doctors surgery, care home, park land, commercial space, dentist surgery, etc.
- this (now expired) permission was considered before the outline approval of SD7 to the South of Yapton, or the proposal to build four hundred additional homes in Climping

This application is not significantly different to the (now withdrawn) application from 2020 and it is clear that the applicant has barely even paid lip service to the very valid concerns of local residents.

This application is on a scale unlike anything seen before in this rural area.

Just to emphasise these points... At full capacity this site will have 4.25 aircraft carriers worth of waste delivered to the Climping/Ford/Yapton area, by road, every single year. This structure could be visible from as far away as Brighton, Portsmouth, and Horsham. The main building will be on a par with the largest building in Littlehampton. The twin stacks will be taller than the spire on Chichester Cathedral.

This structure will dominate the skyline and become the defining landmark in the Arun valley and on the South Coast between Portsmouth and Brighton. This structure will detract from the scenery of the South Downs National Park and affect the situation of a number of listed buildings (including Arundel Castle and Cathedral) as well as conservation areas (such as Yapton).

Some useful comparisons:

| <b>Metric</b>              | <b>Quantity</b>     | <b>Comparison</b>  |
|----------------------------|---------------------|--|
| Main building height       | 38.5 m (13 stories) | Kingmere (tallest building in Littlehampton): 42 m   |
| Stack height               | 85 m (28 stories)   | Chichester Cathedral: 82m<br>Elizabeth Tower (big ben): 95m  |
| Quantity of waste (annual) | 275,000 tonnes      | The new Queen Elizabeth Aircraft Carrier weighs 65,000 tonnes.<br><br>This quantity of waste is the equivalent of 4.25 aircraft carriers.  |
| Visibility                 | 20 miles            | The height of the twin stacks are such that they will be visible on the horizon up to 20 miles away.<br><br>Portsmouth is approximately 20 miles to the West. Brighton is approximately 20 miles to the East.<br><br>Horsham is only a little over 20 miles to the North East. |

### **Suitability of use for the area**

When one considers the scale of the development in terms of building size, capacity, and vehicle movements one must conclude that this is inappropriate for any rural/residential area, especially one which already has limited road capacity.

The development of Ford Airfield will see 1,500 houses, a primary school, a commercial area, a care home, public green space, and a doctor's surgery to the immediate South East, East, North East, and North of this site. The preferred site for a new high school is also to the near North East of this site.

Outline planning has already been approved for SD7 (550 houses) to the South of Yapton, and another 400 houses are planned for Climping.

What is essentially a large incinerator has no business being placed in either a rural location or immediately adjoining a growing residential area.

### **Loss of light/outlook/privacy**

The sun rises in the East and moves across the South, West, to the North through-out the day. This means that the massive structure and stacks will inevitably overshadow much, if not all, of the 1,500 houses, primary and secondary school, care home, and doctor's surgery for much of the day. The public green space to the North of this site will spend much of the day in shadow.

### **Effect on historic features such as listed buildings/ conservation areas**

This scale of this structure is such that it will be visible throughout much of the South Downs National Park and will dominate the skyline over conservation areas in Arundel and Yapton. It will inevitably and permanently damage the area as a whole.

### **Dust/odour/fumes**

No filtration or containment system is perfect. However, well designed they will fail at some point in time. Siting this development (which will also contain ammonia tanks) close to hundreds of existing homes, doctor's surgeries, school, and care home, and immediately next to the planned site of 1,500 houses, new schools, a new care home, a new doctor's surgery, and public recreation space is nothing short of reckless.

There will be many vulnerable categories of people living in and visiting the areas immediately next to this development.

A development like this should be as far away from people as possible. Not only is this close to existing developments it is immediately adjoining a new one.

One must also consider the fumes from HGVs required to deliver a quantity of waste equivalent to 4.25 aircraft carriers in weight annually from the site.

### **Layout/appearance/design of buildings**

The biggest issue around the layout/appearance/design of these buildings is the scale. There is no way to really mitigate or minimise the impact a structure of this size will have on a flat rural landscape.

### **Traffic generation/access/highway safety**

At peak capacity this site will annually process a quantity of waste that is equivalent to 4.25 aircraft carriers. This will need to be delivered to site by road.

In their response to the F/4/20/OUT application at Arun District Network rail stated:

#### **Yapton and Ford MCB level crossings**

*Both MCB crossings currently experience high usage, any additional traffic in the area would create unacceptable traffic queues and tailbacks on both sides of the crossing.*

*The barrier down time at both Ford and Yapton CCTV crossings is already high causing long tailbacks in both directions leading to frustration from motorists and frequent requests to Network Rail for information relating to this. Any increase in road traffic at these crossings would create a longer waiting time for motorists leading to a much higher risk of red light jumping and general crossing misuse.*

*This development is also likely to generate rail trips at Ford Station therefore adding to the current tailbacks and blocking back issues in the AM and PM peaks. During this time the 'drop offs' and 'pick ups' are higher and can cause motorists to manoeuvre in the road causing obstructions to through users of Ford MCB level crossing.*

As such it will not be possible for any of this waste to be delivered South from the A27 by Yapton Lane or Ford Road. It would be inappropriate for this level of traffic to run through Yapton village on the B2233 as well.

The developer proposes that all traffic will be on the A259 and Ford Lane, but we know from sad experience that HGV drivers ignore these restrictions whenever it suits them. There has also been no consideration of the impact that other traffic, displaced from the A259 and Ford Lane by the hundreds of additional HGV movements each day, will have on surrounding roads.

## **Impact on natural environment including animals and their habitat**

Recent developments in the area have included significant works to improve the natural environment and protect animals and their habitat.

This includes a wildflower meadow in the Emerald Gardens, Yapton estate, over which predatory birds hunt, and bat boxes.

A significant structure like this, which will (however well filtered) emit fumes will inevitably have a negative impact on local wildlife. Particularly airborne local wildlife (such as bats and predatory birds).

The planned green space to the immediate North of this site will also be far less effective in terms of promoting local flora and fauna in the near permanent shadow of this structure.

## **Noise/disturbance**

No sound baffling system is perfect. However, well designed they will not block all noise. Siting this development immediately next to the planned site of 1,500 houses, new schools, a new care home, a new doctor's surgery, and public recreation space is nothing short of reckless.

There will be many vulnerable categories of people living in and visiting the areas immediately next to this development. Imagine the impact the noise will have on school classes, play time, sports activities.

A development like this should be as far away from people as possible. Not only is this close to existing developments it is immediately adjoining a new one. The ERF will be a 24/7 operation and the inevitable noise will negatively impact the housing, school, and other facilities that are planned for all around this facility.

One must also consider the noise from HGVs required to deliver a quantity of waste equivalent to 4.25 aircraft carriers in weight annually from the site. The proposal is for these to run from 6am (before many people rise in the morning) until 8pm (after small children's bedtime). The noise nuisance from the traffic alone will be immense.

## **Effect on landscape or character of area**

The Climping, Ford, and Yapton areas are mainly rural with the majority of local buildings being residential. There is some industry on the former site of Ford Airfield, but this constitutes a small part of the make-up of the local area. This development would become the single biggest construction for many miles and would significantly change the character of the area to be more industrial than rural/residential.

The massive structures involved will dominate the, predominantly, flat landscape for many miles. The stack of this building is tall enough to be visible from 20 miles away.

This building would become one of the most visible landmark structures on the South Coast between Portsmouth and Brighton.

Yapton Parish Council has been very successful in limiting most recent housing developments to 2.5 stories. This is because we are in a flat rural landscape. The proposed 13 story building with 28 story stacks in this application are obscene by comparison.

## **Need**

There is a demonstrable lack of need for this development within West Sussex.

A similar facility has recently been approved for the Horsham area (which due to its geography is more suitably located and) which will more than satisfy the current West Sussex need.

Incineration is an environmentally unfriendly solution to waste and as our lifestyles evolve to be greener it is unlikely that significant additional capacity will be required for West Sussex in the future even as our population grows.

The fact that this capacity will not be needed for West Sussex means that, in order for this facility to operate profitably, waste will need to be imported from other counties. By road. Every day.

That means our regional road networks will be clogged by an additional 4.25 aircraft carriers worth of waste being imported into West Sussex every single year, just to feed this facility.

Yours Faithfully,

Peter Dunkley