

Comment for planning application WSCC/011/21

Application number

Name

Address

Type of Comment

Comments

The proposed energy recovery facility is disproportionate in size and not in keeping with existing industrial development in this area. Indeed, it is similar in height to virtually no other buildings in the locale. The tallest in the nearby locality being a twelve-storey block of flats in Littlehampton which does not sit well in its surrounding architecture or in its urban environment and this facility will be even more incongruous in this semi-urban location. This energy recovery facility, its buildings and chimney, will dominate the skyline and will be visible for miles including the tourist/visitor hotspots of Littlehampton, Arundel and the South Downs National Park. No amount of soft or hard landscaping will be able to obscure such a huge development on this flat coastal plain and it will remain a blot on the landscape. The location of the energy recovery facility in this environ is inappropriate. It is in very close proximity to established residential areas in the surrounding villages of Yapton, Ford and Climping all of which are seeing notable new development. Furthermore, and most astonishingly, it will lie immediately adjacent to land already designated for significant residential development with associated educational and community development. Arun District Council is committed to providing 1,500 houses, a new primary and a new secondary school and an industrial development of this type, size, scale and recognised environmental impacts is not compatible with such planned development. Undoubtedly such a sizeable facility needs suitable supporting infrastructure not least during construction, and during operation for the delivery of residual waste materials. However, this site is not serviced by any major roads. Indeed, immediate road access is via Church Lane and Ford Road both of which are narrow single carriageway and unclassified. The undeniable increase in heavy vehicles will further contribute to existing, and increasing levels of congestion along the south coast routes, especially at peak flows and create new safety and environmental hazards, especially on the minor roads which access the site. Furthermore, this energy recovery facility will largely be handling residual waste brought into the area from other counties. This waste is not sorted and much of it will comprise of materials that can be recycled such as plastics and cardboard. Our European counterparts, for eg. Germany, who have practised energy recovery are now running out of 'waste' owing to the success of more sustainable RRR policies. Incineration is very low in our governments sponsored hierarchy of waste. It is the County Council's duty to promote prevention of waste and to facilitate recycling and reuse. If the UK hits its planned 65% recycling target then existing energy from waste facilities are sufficient for handling our residual waste. Since contracts for waste tend to be long term (30-40 years) this works against more sustainable approaches. Waste is required to run the existing plants, in doing so reusable materials are destroyed which works directly against the circular economy. Additionally, the technology for this facility is already out of date and fails to meet current environmental standards. Rather than looking back at past practice government, at all levels, should be looking to the future, focusing on investing in high-end recycling and circular economy policies. Energy recovery is one of the dirtiest ways of creating energy. Tall chimneys are needed to disperse the undesirable and hazardous emissions. How can such a facility be compatible with planned residential development in the immediate area? Incinerating one tonne of residual waste typically generates one tonne of carbon dioxide. Current research from the EU now suggests carbon dioxide from this source has significantly more adverse effects on climate change than those produced from conventional fossil fuel sources such as gas and is not a climate friendly alternative. Energy from waste facilities should be developed in areas designated CCS (Carbon Capture and Storage) - no such area exists in West Sussex. This facility does not fit with our government's new climate change targets. Local air quality will be negatively impacted as, in addition to greenhouse gases, incinerators emit other pollutants and toxins. Emissions include dioxins, NOx and ultrafine particulate matter that can be harmful to both human health and the natural environment. There has never been any government requirement to report particulate emissions in the detail required to accurately assess their impact on human health, however, government reports (DEFRA, Public Health England, Local Government Association) recognise there are no safe levels for particulate matter and adverse effects on human health have been associated with concentrations below the legal limits. Furthermore, it is well documented that such sites generate unpleasant 'rotten' odours, a continuous operational background noise, additional traffic noise and light pollution from the incinerator stack (aircraft warning). Unarguably, all of which have a negative impact on local communities. Overall, this energy from waste facility is not a necessary development. Residual waste and heavy vehicles with associated safety and environmental hazards will be unnecessarily 'imported' into the area. This facility does not fit with the existing development nor is it compatible with the planned development in the villages of Yapton, Ford and Climping. Road access to the site is unsuitable. Furthermore, the technology is out of date and directly opposes more environmentally sustainable waste management and the circular economy. It is the wrong development in the wrong

place at the wrong time.

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Attachments