

Comment on Application WSCC/011/21

- Application Number WSCC/011/21
- Location Ford Circular Technology Park, Ford Road, Ford BN18 0XL
- Proposal

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

Executive Summary

This project involves the building of a structure that will dwarf all others in the immediate area. It will be seen from miles around to truly be a blot on the landscape in the last undeveloped stretch of coast between Pagham in the west to beyond Brighton in the east.

Moreover, this is a polluting blot on the landscape. A truly vast amount of refuse is projected to be brought to the facility, stored and processed/burnt. The pollution of the fleet of heavy diesel lorries required (approx. one every 108 seconds) will be immense. Transport of refuse in such lorries leads to the shedding of a vast amount of litter. This is before we consider the pollution, smell and noise of the incinerator complex itself. This is heavy industry being imported into a rural area – it is difficult to think of how a greater impact could be made.

And then there are the people of the area. The current residents and businesses, and the proposed residents and businesses. A large number of houses are proposed for this area and they will be built in very close proximity to the incinerator. The mix of heavy industry and residential areas has never been shown to be a good idea for residents or for industry.

Finally, we look at the wider infrastructure required to serve this facility. In short there need to be suitable transport links to allow this vast fleet to flow in and out of the facility. The infrastructure is not there and it does not appear possible to put it in place. Lorries are proposed to flow from the A259 and up church lane. The idea that this route can serve such a vast flow of additional traffic is impractical to the point of being fanciful.

In short, a rural area is proposed to be spoilt by a polluting blot on the landscape, whose pollution will be magnified and spread by a fleet of diesel lorries serving it. It is obvious that the facility is incompatible with local infrastructure and the lives of residents, particularly those in new houses to be built so close to the proposed site of the incinerator complex. It is thus further obvious that the proposed facility would blight the lives of residents, businesses and the environment and that this planning application should be rejected.

In more detail:

Transport infrastructure

The current roads are not adequate for the amount of traffic that will be required. Given that a smaller facility was already envisaged requiring 240 trucks a day a facility of approximately double the size would require approximately double the number of lorries.

At an extremely conservative estimate this would be approximately 400 lorries a day. (Assuming 12 hour working day that is a lorry every 108 seconds or so.) 480 lorries over 12 hours is a heavy lorry every 90 seconds. This is staggeringly frequent.

The plans proposed are opaque on how such traffic provisions could be achieved. Consequently they is not actually planning at all in this respect that we are privy to.

To those with any local knowledge it is clear that any of the routes to the site that might be used for lorries will all will suffer congestion because of this incredible additional traffic burden.

Furthermore, the large amount of stationary traffic that will arise at these predictable 'pinch points', including road junctions, roundabouts and level crossings will emit a truly staggering amount of diesel fumes in a relatively small area. The deleterious effect of such fumes, (particulates and NOx) are ever better known and ever more alarming. The health of people in the vicinity of these 'pinch points' will be negatively affected. Furthermore the quality of their lives will be negatively affected because of living in these locations – in short the value of their houses will be blighted.

Dualling the A27 might provide a route past but reaching Ford would still require traversing one of three level crossings. The delays are already very significant, verging on the astonishing, delays of 40 minutes and up are commonplace. Necessarily, such a large increase in traffic over any or all of these pinch points will cause such delays to be ever present. This will significantly and adversely affect the residents and businesses of all of the areas south of the A27. There may be queues for the level crossings now, but adding tens of diesel lorries to these queues will produce horrible pollution hotspots.

I turn now to the types of lorries that will be used to transport the refuse. If these are as standard for this use they will be tall open-topped container lorries. The refuse is piled inside and held down using a retractable fabric cover/awning. I used to commute on the north circular in London (A406) and then onto the A40. I have driven behind such lorries more times than I care to remember. What I remember consistently is the consistent stream of rubbish shed from these lorries as they travel. 400 lorries per day travelling to Ford will produce a lot of rubbish on route. Who is going to clean this up? In an effort to cut their operating costs the council has already asked residents to form squads to pick litter and cut the foliage

at the roadsides. This already seems unreasonable, but to pick up the litter caused by a profitable business just to keep your home tidy is a bitter pill to swallow.

Added to this will be the damage to the roads in this area and further afield. None of them was ever intended to tolerate or survive such a heavy traffic flow. Level crossings are certainly not and damage to a level crossing necessitating its closure would be a major blow to residents and business of this area. But such road damage causing additional road closures and road works is an entirely predictable consequence of the increased traffic that the proposed incinerator will necessarily bring. This is an unacceptable cost that would have to be borne by council tax payers.

To sum up, the roads are already inadequate for the current traffic. They will be overwhelmed by this increased traffic. Spreading the traffic over multiple routes will simply cause greater congestion and spread the pollution and road damage of 400 trucks a day to a greater area.

Pollution

Noise

This is an enormous industrial building transporting and moving approximately XX tonnes of material a day. Moving this amount of material is noisy. It is noisy to bring it to the facility because of the trucks carrying it; it is noisy to unload a XX tonne truck every 83 seconds by pouring the refuse from the container; it is noisy to sort such refuse into heaps because of the moving equipment that must be used; it is noisy to transport such material into the incinerator. This is a major industrial installation and the noise pollution will be significant

Smell

Refuse smells – there is no getting away from it. Bringing XX tonnes of refuse to a small area will smell, and badly. To claim otherwise is simply not credible. Moreover, the efficient (i.e. continuous) operation of the incinerator will require a stockpile of refuse to be on hand when trucks cannot run or transport is disrupted. Thus a temporary landfill site must be created and maintained to feed the incinerator. This will smell - with the amount of refuse and smell peaking at the end of the working day in order that there is sufficient material to last the night. That is, the smell will peak when most people are in their homes. Moreover, the smell will be yet higher in the hotter months when most people are outside enjoying their gardens. People in this area are attuned to smells. The occasional tide bringing a heavy crop of seaweed up on the beach or muck being spread on fields is well noted. But this occasional unpleasantness pales in comparison to the consistent and constant unpleasantness that the incinerator complex must bring. This will blight the enjoyment of local homes and adversely affect local businesses, especially in the hospitality and tourist industries.

Traffic Pollution

As noted above, 400 trucks a day is a truck ever 83 seconds during a 12 hour working day. Those are large diesel trucks. This is not 'clean diesel' nor could it ever be. This is a dirty and polluting mess with its focus on Ford. The pollution would be bad if the trucks' journey to Ford was unimpeded but it won't be. There will be 'choke points' on any route to the site that a lorry might use. Thus pollution hotspots will be created at these choke points because of this huge increase in diesel traffic. People in nearby houses and businesses will be adversely affected and their lives, homes and businesses blighted by increased pollution.

Incinerator Pollution

This is an incinerator. To claim that there will be no emissions is risible. To claim that the emissions will be controlled to the extent we 'won't know it is there' is fanciful at best.

To claim that emissions could ever 'fail safe' is unrealistic and thus not defensible.

A lot can be told by the height of the chimney. That is a tall, tall chimney to take emissions far away into the atmosphere. Those emissions come down somewhere (as historically evidenced by high chimneys of this type in Britain sending emissions out of Britain high in the atmosphere to cause acid rain in Norway). It is clear that if the stuff you are emitting is not noxious you only need a shorter chimney as you don't fear the emissions staying in the local area. This chimney is a monument to fear of pollution in your own back yard. It appears also to be a tool to dump the emissions somewhere else. That would be a despicable thing to do.

Size and Visibility of the Facility

Visibility

Most people in this area have looked out from the Downs and spotted the landmarks, the sheer height and volume of the proposed complex will dwarf them all.

This would be the largest building in the area by far. The proposed facility dwarfs Kingsmere apartments and the gasometer in Littlehampton and these can be seen for miles along the coast and up on the Downs. In short, this will be a blot on the landscape in the only non-built-up area along the coast from Pagham in the west to beyond Brighton in the east.

Light Pollution

This is one of the few areas of the south coast that suffers from less light pollution. There is a reason by Patrick Moore lived in Selsey – he could see the stars. This is one of the few areas along the coast where you can see the Milky Way with the naked eye. There is already encroaching light pollution from industrial estates. The incinerator is so large that it would have to be lit brightly for the safety of local air traffic, to say nothing of the staff working there. Thus the light pollution would be worth and more stars taken away from us all. As evidence of this the recent comet NEOWISE, probably the brightest comet this century, was only visible in the unnatural haze of light pollution by using binoculars. The

proposed incinerator can only make this worse and block out the beauty of the heavens.

Burning Waste that Should be Recycled

Similarly fanciful is the idea that this facility contributes to the improvement of the wider environment. A recent 'Dispatches' documentary on Channel 4 concluded that "the total carbon emissions from incineration have now overtaken those from coal". [link: <https://www.channel4.com/press/news/dirty-truth-about-your-rubbish-dispatches-monday-8th-march-8pm-channel-4>] Also, the same programme found that "on average 11% of the waste we put out for recycling is being incinerated". Burning recyclables is short sighted at best. But in providing more incineration capacity I can foresee a reason to burn yet more. An idle incinerator is not profitable; where will the fuel to sustain it come from? We already know that this facility is not needed to accept the waste generated in West Sussex. Thus it is only needed for waste from other counties. So this facility is only needed so that we can offer the surrounding areas the chance to recycle even less. That is irresponsible to our environment. Furthermore, how far is this waste coming? We worry about food miles, but what about the miles of diesel oil that must be burnt to bring the refuse so far? These are unknown and unlimited levels of pollution and carbon emissions that are not worth bearing.

Incoherent planning

A large number of houses are planned to be built in this area. The new housing developments and school, effectively a new town, are not consistent with building a new heavy industry site directly abutting it.

How can it be that permission for houses has been given and the building of houses abutting new heavy industry is even entertained? The new housing is proposed to comprise 20% affordable housing. This might be cynical, but bet that housing will be sited next to the incinerator site...

This appears to be a recipe for an 'oven-ready' deprived area.

Why? Heavy industrial facilities make the surrounding area less desirable to live in. But houses must be built and affordable houses need to be built. I would predict that this proportion of affordable housing would rise significantly if the housing developers profits are blighted by the presence or threat of a heavy industry incinerator. Still further, constrained profit means affordable housing that is even more 'cheaply built'

Thus a perfect storm brews... For a developer presented with the economics of building houses in the shadow of heavy industry there will be economic pressure to build affordable homes as there will be less demand for less affordable or larger homes in an industrial area. Thus the proportion of affordable homes rises and simple economics dictates that a mixed residential area will not be profitable. Consequently, no developer will build such a desirable mixed residential area in the shadow of heavy industry.

The result is that you have built not a shiny new town but a prefabricated deprived area. A mass of insufficiently mixed cheap and/or affordable housing abutting heavy industry is a 'model' that has been seen in the UK for about 170 years now. This model does not lead to economic prosperity and wellbeing for the residents but depression and deprivation. This appears to be on the horizon here.

Indeed such an analysis chimes with a recent article in the national press that notes that incinerators are preferentially sited in deprived areas. [Link: <https://www.theguardian.com/environment/2020/jul/31/uk-waste-incinerators-three-times-more-likely-to-be-in-deprived-areas>]. However, our area is not yet deprived. We must steer away from these shoals; it would be stupid to drive ourselves onto the rocks.

In Conclusion:

- Heavy industry is proposed for a rural area in the shape of this vast complex.
- The pollution of the site in terms of pollution, smell and noise is magnified by the pollution of the fleet of diesel transporters required to service it.
- The transport infrastructure is inadequate and cannot be made adequate.
- The proposed facility will be the biggest building in the area by far; its volume will dwarf any other building for miles and miles around. Its proposed chimneys are huge. The plume from them will be even bigger and more visible.
- The proposed facility and its heavy industrial nature is simply incompatible with residential areas and especially the new houses being built close to the proposed site.
- The facility will thus blight the lives and homes of residents.

This planning application must be rejected.