

WSCC PLANNING REFERENCE - WSCC/011/21

Ford Circular Technology Park, Ford Road, Ford, Arundel BN18 0XL

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

Introduction

Yapton Parish Council (YPC) has fully considered the above application and remains strongly opposed to a proposal of this size and scale in such a vulnerable landscape setting with multiple heritage assets.

YPC, whilst recognising that this is a new amended application, is greatly disappointed at the lack of value attached to the strong concerns raised by both the Community and key assets such as Arundel Castle, Tortington Priory Ancient Monument and Grade 1 listed Church of St Andrew Ford. The revised proposal fails to address in any meaningful manner the significant and detrimental impact it will have on the landscape, ancient monuments, grade 1 and 2 listed buildings and their settings as well as the South Downs National Park.

The applicant has merely reduced a significantly tall and overbearing structure by 12m, the proposed structure now standing at 38.5m, almost three times higher than a standard modern industrial unit which typically stand at 13m height.

The applicant states that ***'all other aspects of the proposed development remain unchanged such as waste processing capacity, HGV movement and routes, air quality, hours of operation etc'***.

YPC therefore see no obvious improvement in this revised proposal. The unit will remain highly visible and dominant within many POV within Arun, the South Downs National Park and Chichester. It will cause a significant and detrimental impact on the grade 1 listed St Andrews Church and its setting which lies only 500m north east of the applicant's site.

The pollutants will remain a strong concern to both nearby and further afield residential communities as well as potentially harming the Grade 1 listed St Andrews of Ford Church and its delicate wall paintings.

HGV movements and size of vehicles remain inappropriate for the roads servicing the site and growing residential nature of the location.

YPC objection remain as stated in November 2020 and outlined below:

Whilst acknowledging that the location, the Ford Circular Technology Park formerly known as the land of the former Ford Blockworks, is identified in West Sussex Waste Local Plan 2014 (WSWLP 2014) for such a use and has a live approved planning consent, WSCC/096/13/F, for a waste treatment facility (granted 2015) Yapton Parish Council (YPC) strongly object the above application.

Firstly, YPC continues to raise its deepest concerns with regard of the timing of this application which in its view give rise to substantial regional controversy and believe that the consultation period should be substantially extended. There are significant concerns across Ford, Yapton, Climping and the wider Arun district that there has been only limited community engagement given the potential impacts of the proposal. Also as a result of the application being submitted during the Covid-19 lockdown there has been little wider community awareness of the proposal until very recently.

It should also be noted that the applicant has continually referred those engaged to their Lakeside Facility as a comparison. It is not. Lakeside is a substantially lower building with a curvilinear roofline and its location is bounded by the M25, M4 and Heathrow runway; a very different setting to Ford's semi-rural location and B class road network.

Planning

YPC believes that the proposal may conflict with national policies on several important matters. Namely, protecting the valued landscapes of the South Downs National Park and AONB, which are given the highest protection in the NPPF and potentially hindering the delivery of homes across Arun District Council.

YPC strongly believe that this application is in contradiction to the NPPF 2019 para 11.

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; (NPPF 2019 para 11)

The application states that the new scheme will support a capacity of 295,000tpa of waste material, 45,000tpa in excess of that allocated with the WSWLP 2014 Policy W10(c) and 75,000tpa in excess of that which is consented.

The proposal places insufficient weight on Arun District Council's ALP 2018 Housing Delivery Policies and ignores the Ford Neighbourhood Plan 2017-2031 Housing Policy. Both Plans designate the surrounding land to the applicant's site for Strategic Housing - Site SD8 (Ford Airfield) accommodating up to 1,500 homes. Both the ALP and FNP recognise the applicant's site as a strategic waste location for capacity of up to 250,000tpa. Indeed, the applicant's site received consent in 2015, prior to both strategic documents being adopted and made respectively, for up to 220,000tpa waste capacity in a building half the height and substantially smaller in terms of mass and land coverage (WSSC/096/13/F). The proposed scheme's design and size fails to consider the ALP and FNP housing policies and places a significantly adverse effect on the deliverability of Ford Airfield housing site, SD8.

YPC strongly believe that **the local need for housing far outweighs the need to recycle an additional 45,000tpa** in a substantially higher and larger building that will also have a significant impact on both the character are the area and its landscape. YPC question whether the local and District need for housing should be wholly compromised when consent already exists for a similar facility but in a significantly smaller building that is compatible and blends in with housing, the overall area and the character and landscape of the Arun Coastal Plain and South Downs National Park.

YPC is of the view that the applicant's proposal contradicts **the West Sussex Waste Local Plan 2014 (revised 2019) Policy, W10(c)**. This states that the development of an allocated site must take place in accordance with the policies of the WSWLP and satisfactorily address the 'development principles' for that site identified in the supporting text.

The Ford allocation (Site north of Wastewater Treatment Works, Ford) states that it has the capacity to deliver up to c250,000tpa. The application states that it will exceed this allocation by 45,000tpa. A significant departure from West Sussex's own Waste Policy and the current planning consent WSCC/096/13/F.

West Sussex Waste Local Plan 2014 (WSWLP 2014) Policy W11 clearly states that whilst a site may be designated for a waste facility it will only be permitted if it proves not to have **'unacceptable impact on the character, distinctiveness, and sense of place of the different character areas of the County and that they reflect and, where possible, reinforce the character of the main natural character areas.'** (WSWLP 2014 Policy W11)

Clearly the size and massing of the new proposal is a significant departure from the main natural character of the area with the existing industrial units being no higher than 12m. Moreover the current consented scheme is for a building with a roofline extending to 22m at its highest point and a dual chimney stack of 50m whereas the new proposal is for a unit with a roofline extending to 38.5m high covering an area of 4 football pitches and now two stacks of 85m. The proposal will dominate the skyline and become the new dominant landmark of Arun's coastal plain, Littlehampton and surrounding towns and villages.

The proposed building will be a highly visible and dominant, being the tallest landmark along the whole of the South Coast, visible from the sea and South Downs. It will have an impact on both the character of the Arun's Coastal Plain area and the views from of the South Downs National Park, Arundel town and Castle. The height of the stack is such that it will be visible on the horizon up to 20 miles away. Portsmouth is approximately 20 miles to the west and Brighton is approximately 20 miles to the east.

The need for a facility that does not cause harm to the landscape is further reiterated by **WSWLP 2014 Policy W12** which seeks to ensure that proposals for waste development are of a high quality and, where appropriate, the scale, form and design (including landscaping) take into account a number of identified matters. They include the need to integrate with adjoining land-uses and have regard to local context including: the character of different parts of West Sussex; the topography, landscape and skyline of the surrounding area; views into and out of the site; and, the use of materials and building styles.

The new proposal is in general block form standing at a continuous height of 38.5m with two 85m chimney stacks whereas the consented unit stands at 22m height with a dual chimney stack at 50m. The applicant's proposal is significantly taller in height and increased in volume. The proposal will be overbearing and substantially change the sense of place and nature of the location from low density light industrial use (most buildings being no more than 12m in height) to heavy intense industrial use, one which is perceived as incompatible with housing. This proposal has the very strong potential to blight the future use of the

surrounding land for a generation depriving Arun District of much needed Strategic Housing land for up to 1,500 homes, a direct conflict with Government Policy.

The size and massing of the unit does not blend into the surrounding area. Furthermore, it is located in an area that Arun District Council's Landscape Capacity Assessment of Strategic Sites February 2017 states to have '**substantial landscape sensitivity and moderate landscape value.**' (Arun Landscape – Capacity Ford and Climping ref PESP5d). These classifications highlight how exposed the location is in visual terms as well as highlighting the lack of natural forms to help obscure and soften the significant impact this huge building will have on the surrounding landscape and key viewpoints.

YPC note that the applicant has placed considerable weight on its recent successful appeal decision concerning its replacement ERF at the Former Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD (Appeal Ref: APP/P3800/W/18/3218965). The Inspector makes clear that the size and mass of the proposed building in Horsham's case was deemed acceptable as the closest sensitive landscape was 15km away and the building would be partially surrounded by undulating landscape and woodland reducing its impact on the surrounding landscape. The unit is also in a quarry with a curvilinear roof line being 36m at its highest point. The Ford proposal's only similarity is in function and no more. It is also approximately only 2.30km south of the South Downs National Park and 2.85km south east of an Ancient Monument (Tortington Priory) and 500m south west of the grade 1 listed Church of St Andrew Ford. In fact the applicant's site has a strong correlation to Land at Levitt's Field, Waterbeach Waste management Park Ely Road Cambridgeshire (application Ref: S/3372/17/CW) which was refused planning, had an appeal dismissed and SoS decision to uphold the appeal decision on grounds of landscape value and harm to heritage assets to name but a few.

YPC believes that the proposal therefore raises significant architectural and urban design issues - given the significant scale of the proposal, the bulk of development is clearly out of character and impossible to screen. It will blight any housing proposals due to its close proximity and significantly adversely impact views from the South Downs National Park and that of an Ancient Monument and grade 1 listed building.

On a more granular level the massing and height of the unit will dominate Yapton's eastern boundary significantly lessening its rural character and sense of place. The operation of the facility will also greatly impact Yapton's residents due to the 24 hour nature of the unit leading to significantly increased light pollution at night impacting both residents and the South Downs national park Dark skies policy. There will also be substantial noise pollution due to the operation of the two buildings and HGV movements.

YPC have deep concerns on the impact this proposal will have on the overall Community benefit along with whether it truly meets the social and economic benefits of the wider community of Arun District. ADC LP 2018 clearly designates the surrounding land for housing and accommodates the consented ERF of 22m height and capacity of 220,000tpa. The 1,500 proposed homes and consented ERF can sit side by side without significant detriment to either's demands and requirements.

Need

The proposed ERF at 38.5m height and larger massing has a significant and detrimental effect on the sustainability of the proposed 1,500 homes, placing ADC's housing policy at risk. The question of Community need must be considered and which need is the greater – the need for 1,500 homes in a District with limited options for future housing growth or the need for a significantly larger building to house the applicant's ERF plant. A plant that in the long term, will only generate 56 jobs? It is also questionable whether incineration is the most sustainable practice for WSCC to meet its carbon zero target.

West Sussex CC has identified several sites to fulfil its required waste capacity up until 2031 with Ford being identified for up to 230,000tpa. The current consented scheme has capacity of up to 200,000tpa, significantly diluting the need for a larger facility at Ford. This must be compared to ADC's shortfall in both housing supply and suitable available and developable alternative housing land to accommodate the potentially blighted 1,500 homes designated for the Ford Airfield Strategic Housing Site.

Conclusion

YPC therefore object in the strongest form to this planning application. It is clearly incongruous with its setting, landscape and nearby heritage assets, incompatible with the proposed 1,500 new homes on adjoining land, exceeds West Sussex's own waste capacity need for Ford and firmly ignores the overarching Community need and social benefit for housing growth. This application must be refused planning.