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West Sussex County Council
County Hall
Chichester
PO19 1RH

Date: 2nd June 2021

Please ask for: Raymond Cole

Tel: 01903 737598

Your Ref:

Our Ref: F/6/21/WS

Dear Sir/Madam,

Consultation from West Sussex County Council

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 waste, including ancillary buildings, structures, parking, hardstanding and landscape works.

Ford Circular Technology Park Ford Road Ford BN18 0XL

Thank you for your recent application as above. I am able to inform you that this Authority **objects**.

Officers and Members of the Council's Planning Committee have considered the application details and the Environmental Statement submitted for comment, to which an objection is raised by the Local Planning Authority. As set out in the officers' report (copy enclosed), the reasons for objecting are:

- The need for a facility of the proposed size, to enable West Sussex to achieve net self-sufficiency in waste management, has not been clearly demonstrated;
- The scale and height of the proposed development will have a significant adverse visual impact on the character of the landscape, on local settlements including the town of Arundel and on the South Downs National Park;
- It has not been demonstrated that the scale, form and appearance of the proposed buildings are of the highest quality;
- The amount and scale of development proposed for the site is too large to enable a comprehensive and effective landscaping scheme to be implemented;
- The cumulative impact of traffic on the local highway network, taking into account all existing, permitted, allocated or proposed development in the area, has not been satisfactorily addressed;
- The submitted noise assessment has not adequately considered all existing sensitive receptors or the whole of the surrounding strategic housing allocation;
- It has not been demonstrated that odour would not be a problem at sensitive receptors nearby, including the surrounding strategic housing allocation; and
- The proposal has not been designed in a comprehensive and co-ordinated manner to avoid potential conflicts with the surrounding strategic housing allocation.

The Committee considered that the proposed development fails to accord with the policies of the West Sussex Waste Local Plan 2014 (notably W11, W12 & W19) and the Arun Local Plan 2011-2031 (as listed in the officers' report).

Should West Sussex County Council be minded to grant planning permission, Arun District Council would request the imposition of conditions to secure the following:

1. The use of only white sound reversing alarms for vehicles on the site;
2. Deliveries to the site during specified hours only in both the construction and operational phases;
3. Mitigation measures to accord with the Air Quality and Emissions Mitigation Guidance for Sussex (2020);
4. Improved cycle and pedestrian access;
5. The use of electric vehicles on the site where possible;
6. Dust management plans to cover both the demolition/construction phase and the operational phase;
7. A scheme to deal with the risks associated with contaminated land; and
8. A comprehensive landscaping scheme.

Members also resolved that, should West Sussex County Council be minded to approve the application, a request would be made for the Secretary of State to call-in the application for his own determination.

I trust this information is of assistance to you.

Yours faithfully



Neil Crowther
Group Head of Planning

Recommendation Report for County Matter Consultation

REF NO: F/6/21/WS

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 waste, including ancillary buildings, structures, parking, hardstanding and landscape works.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION

This application is a "county matter" that will be determined by West Sussex County Council. The County Council has consulted Arun District Council as a statutory consultee and will need to consider any representations, which are made in response, as material considerations to be taken into account before determining the application.

It is a full application seeking planning permission for the construction and operation of an Energy Recovery Facility (ERF) and a Waste Sorting and Transfer Facility (WSTF). The ERF building would be located in the centre of the site and would feature a bunker hall, boiler hall, turbine hall and two stacks. It would also include visitor, administrative and welfare facilities. The WSTF would be located in the south-western part of the site. Other buildings and structures ancillary to the ERF and WSTF include a gatehouse, weighbridges, air cooled condensers, electricity transformer, pump houses, storage tanks, staff and visitor parking and internal roads. Bunds and landscape planting would be located along the west, north and east boundary to screen the lower part of the buildings and the activity on the site at ground level.

The ERF would be capable of treating 275,000 tonnes of non-recyclable waste each year from homes and businesses across West Sussex and neighbouring counties, which would generate 28MW (net) electricity. The site already benefits from planning permission for an ERF alongside a waste transfer facility that is currently operational. The extant permission is for a facility that would handle up to 200,000 tonnes of waste per annum. The proposed development would increase this amount by 75,000 tonnes per annum. The ERF would sit within the existing site boundary, with access via the recently opened new entrance at Ford Road. Existing

buildings on the site would be removed, making way for the ERF and supporting buildings including a replacement for the current waste transfer station.

The site currently has planning permission for 120 HGVs to enter and exit the site (240 HGV movements) Mondays to Fridays and 60 HGVs to enter and exit the site (120 HGV movements) on Saturdays (with HGV routing south towards the A259). It is proposed that these limits would remain in place during operation of the proposed ERF and WSTF.

The stated benefits of the project include:

- Creation of 58 new permanent jobs
- Treatment of a total of 295,000 tonnes of non-hazardous waste a year at the ERF and WSTF
- Power for around 68,000 homes
- Opportunity to provide heat and power for local homes, businesses and public facilities
- Provision of apprenticeship, graduate recruitment and management training schemes.

The application comprises a comprehensive set of plans, drawings and documents, including an Environmental Statement.

The changes that have been made to the proposal considered by the Development Control Committee on 2 September 2020, include:

- a revised site layout and orientation of buildings;
- a reduction in height of the main ERF building;
- a change in the architectural design; and
- an increase in the landscape bunding and planting.

SITE AREA

6.72 Hectares

SITE CHARACTERISTICS

The site is partly used as a waste transfer station and is partly vacant. The waste transfer station building is located towards the centre of the site and portacabins, parking spaces, weighbridge and containers associated with this operation are situated to the west. There are two vacant former hangar buildings in the north of the site and a large area of hardstanding is situated in the south and east of the site.

CHARACTER OF LOCALITY

The site is surrounded by agricultural land on all sides apart from the south and south west, where the adjacent land use is sport and recreation (playing pitches). The 'Flying Fortress' (indoor children's play area) and the 'Arun Sports Arena' (indoor five-a-side football facility) lie beyond the playing pitches to the south west. The Ford Wastewater Treatment Works lies beyond to the south. To the west are industrial units and residential properties beyond. There are further residential properties in Ford Lane and Rodney Crescent to the north and east respectively.

RELEVANT SITE HISTORY

F/19/13/	Proposed development and operation of a waste treatment facility. This is a County Matter and will be determined by West Sussex County Council.	Objection 21-01-14
F/12/18/WS	New access road - This application is a County Matter Waste Application & will be determined by West Sussex County Council (EIA)	No Objection 23-07-18
F/15/20/WS	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. This application is a County Waste Matter will be determined by West Sussex County Council.	Objection 10-09-20

For clarification:

F/19/13 - Planning permission (WSSCC/096/13/F) was granted by West Sussex County Council on 9 January 2015 for the development and operation of a waste treatment facility at the site. Permission was granted subject to a s.106 agreement controlling hours, volumes and routing of HGVs.

F/12/18/WS - Planning permission (WSSCC/027/18/F) was granted by West Sussex County Council on 15 August 2019 for a new access road at the site and the existing s.106 agreement was varied.

F/15/20/WS - This application (WSSCC/036/20) was withdrawn on 31 March 2021.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

ENVIRONMENTAL HEALTH: Objection

There are concerns about the proposed development because of the impacts of noise and the provision of insufficient information on other matters including air quality and odour.

Air Quality, Dust and Odour - While the environmental statement has considered the human health effects on existing receptors, additional information is sought in relation to the future residential use of the adjacent site.

Noise - Questions have been raised about the assessment methodology, the impacts of noise during

both construction and operational phases, the impacts of night-time operational noise and the uncertainty of impacts on future residents occupying homes on the adjacent site. There is also concern about the potential impact of noise upon users of the adjoining playing fields at the Arun Sports Arena.

Contaminated Land - The use of model conditions is recommended to deal with the risks associated with contaminated land.

PARKS AND LANDSCAPES:

"This application still proposes the construction of an energy recovery, waste sorting and transfer facility that will be considerable in size and massing and will sit well above the existing skyline. There is some existing vegetation on the boundary of the site and along nearby field boundaries, but the images and documentation provided demonstrate this will have little effect in screening views of the building structure, both near and distant. The coastal plain does not provide the natural landform which would assist in delivering a more elevated, enhanced screening solution."

The presence of the waste facility has the potential to impact greatly on existing dwellings, the proposed housing development (F/4/20/OUT), the enjoyment of the public open space and use of the adjacent sports facilities.

The landscape proposals will go some way to mitigate the immediate environmental and visual impacts, including those of the acoustic fencing. However, planting on the bunds will take considerable time to establish and the development would remain a prominent feature in the landscape during this time and beyond.

CONSERVATION OFFICER:

The 1948-51 hangars on the site can be considered as non-designated heritage assets. The heritage assessment identifies that the hangars have been significantly altered and are therefore of limited significance.

However, there are many heritage assets in the surrounding area that are of high significance. These include:

- Listed buildings such as, Atherington House, Ford Place, Southdown House and The Lodge, Newhouse Farm and three churches at Yapton, Ford and Climping (all of which are listed at grade I);
- Scheduled Monuments of Tortington Priory (to the north of the site) and Mediaeval Earthworks at Church Farm (to the south);
- Locally Listed Buildings such as 1&2 Ford Cottages;
- Remnants of the Portsmouth and Arundel Canal;
- The historic hillside town of Arundel with its many listed buildings; and
- Yapton Main Road & Church Lane Conservation Area and Lyminster Conservation Area (both containing listed and locally listed buildings).

The proposed development will be visible from Place Farm (Atherington House, Ford Place, Southdown House and The Lodge). It will be "a prominent and intrusive addition to part of the remaining rural setting of the listed building which will result in a permanent substantial adverse effect".

The scale of the proposal and the impacts identified in the heritage assessment mean that it will have an impact on the heritage assets. The impact will vary according to the location and nature of the individual assets. Based upon the assessment, it would appear to be at least less than substantial harm in accordance with paragraph 196 of the NPPF and potentially substantial in some cases.

COMMENTS ON CONSULTATION RESPONSES:

Responses noted. The Planning Services Team at West Sussex County Council will have consulted the South Downs National Park Authority, Natural England, Environment Agency, Southern Water, Sussex Police, Network Rail, and their own Highways Officers, Drainage Engineers and Ecology Advisors. The consultation with Arun District Council specifically requested the views of the Environmental Health Officer.

POLICY CONTEXT

Designation applicable to site:

- County Waste Local Plan Strategic Waste Site Allocation
- Inside the Built-up Area Boundary
- Surrounded on all sides by Strategic Housing Allocation SD8 Ford

DEVELOPMENT PLAN POLICIES[Arun Local Plan 2011 - 2031:](#)

DDM1	D DM1 Aspects of form and design quality
DSP1	D SP1 Design
ECCSP1	ECC SP1 Adapting to Climate Change
ENVDM4	ENV DM4 Protection of trees
ENVSP1	ENV SP1 Natural Environment
HERDM1	HER DM1 Listed Buildings
LANDM1	LAN DM1 Protection of landscape character
QEDM1	QE DM1 Noise Pollution
QEDM2	QE DM2 Light pollution
QEDM3	QE DM3 Air Pollution
QEDM4	QE DM4 Contaminated Land
QESP1	QE SP1 Quality of the Environment
TDM1	T DM1 Sustainable Travel and Public Rights of Way
TSP1	T SP1 Transport and Development
TSP3	T SP3 Safeguarding to Main Road Network
WMDM1	WM DM1 Waste Management

[West Sussex Waste Local Plan 2014:](#)

West Sussex W10 Strategic Waste Allocations
West Sussex W11 Character
West Sussex W12 High Quality Development

[Ford Neighbourhood Plan 2019 Policy EE10](#)

Ford Neighbourhood Plan 2019 Policy EE3
Ford Neighbourhood Plan 2019 Policy EE7
Ford Neighbourhood Plan 2019 Policy EH1
Ford Neighbourhood Plan 2019 Policy EH2
Ford Neighbourhood Plan 2019 Policy EH4

Quality of Design of commercial buildings
Protection of existing businesses
Sustainable Commercial Buildings
Protection of trees and hedgerows
Renewable Energy
Surface water management

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

SUPPLEMENTARY POLICY GUIDANCE:

SPD11	Arun Parking Standards 2020
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CONCLUSIONS

This is a "county matter" application that will be determined by West Sussex County Council (WSCC). Arun District Council (ADC) is a consultee only, whose role is not to decide the application. The following sets out ADC's proposed response to WSCC. The main issues to be considered are:

- The principle of the development;
- The need for the proposal;
- Landscape and visual impacts;
- Nature conservation;
- Conserving the historic environment;
- Traffic and access;
- Air quality;
- Odours;
- Noise;
- Lighting;
- Protection of water resources and flood risk; and
- Potential land use conflict.

THE PRINCIPLE OF THE DEVELOPMENT & KEY POLICIES

Apart from the access road, the application site is designated as a Strategic Waste Allocation in the West Sussex Waste Local Plan (April 2014) (Policy W10 and Policy Map 1). Policy W10 states that such sites are acceptable, in principle, for the development of waste management facilities for the transfer, recycling and/or recovery of waste. The Policy adds that proposals must accord with the policies of the plan and satisfactorily address the development principles set out in the supporting text.

The principles set out in paragraph 7.3.9 of the plan are:

- development of the site is to be comprehensive;
- a comprehensive landscaping scheme is required;
- assessment of the impact on the listed buildings to the north and possible mitigation;
- archaeological mitigation if substantial new ground excavations are required;
- assessment of impacts on the aquifer and possible mitigation;
- assessment of impacts on the amenity of users of public rights of way and possible mitigation and enhancement;
- assessment of the impact (transport, noise, odour) on the amenity of dwellings to the north east and south west and possible mitigation;
- the cumulative impacts of traffic, noise and odour on the environment and local communities to be satisfactorily addressed, taking into account all existing, permitted, allocated, or proposed development in the wider area;
- assessment of the possible closure of the existing access north of Rodney Crescent and the use of an alternative access to the site from Ford Road (now completed);
- assessment of the impact of additional HGV movements on highway capacity and road safety and possible mitigation; and

- a routing agreement to ensure vehicles enter and exit via Ford Road to the south and not to or from the A27 to the north. Access via Rollaston Park/B2233 for HGVs should also be prevented. (The latter is achieved through use of the new access.)

These development principles are considered further among the issues below.

Among the policies of the Waste Local Plan, Policy W11 requires proposals to protect and, where possible, reinforce the character of the surrounding area, Policy W12 requires development to be of high quality and Policy W19 seeks to protect and, where possible, enhance public health and amenity.

The Policies Map of the Arun Local Plan 2011-2031 identifies the main part of the site as a Strategic Waste Site Allocation, due to it being allocated in the West Sussex Waste Local Plan. Policy WM DM1 of the Arun Local Plan 2011 states that "there will be a general presumption against any development which may harm or prejudice the operation of existing and allocated waste facilities and infrastructure".

The access road passes across the Strategic Housing Allocation (SD8) that surrounds the application site. Policy H SP2c of the Arun Local Plan states that the Ford Strategic Allocation will provide at least 1,500 dwellings over the plan period.

Both the application site and the Strategic Housing Allocation are within the defined built-up area boundary, where Policy SD SP2 states that development will be permitted subject to consideration against other policies of the local plan.

For this specific type of development, the NPPF requires opportunities to be identified for co-locating potential heat customers and suppliers (Para. 151).

National Planning Policy for Waste (NPPW) seeks to ensure that waste management facilities are well-designed, so that they contribute positively to the character and quality of the area in which they are located (Para. 7).

National Planning Practice Guidance states:

"The waste planning authority should not assume that because a particular area has hosted, or hosts, waste disposal facilities, that it is appropriate to add to these or extend their life. It is important to consider the cumulative effect of previous waste disposal facilities on a community's wellbeing. Impacts on environmental quality, social cohesion and inclusion and economic potential may all be relevant. Engagement with the local communities affected by previous waste disposal decisions will help in these considerations." (Paragraph: 047 Reference ID: 28-047-20141016)

The proposed development of the site for an energy recovery facility and waste sorting and transfer facility is therefore acceptable in principle, but it must accord with development plan policies in its details in order to be approved.

THE NEED FOR THE PROPOSAL

In their supporting statement, the applicants draw attention to paragraph 6.2.8 of the Waste Local Plan, which states:

"There will be no requirement for applicants to demonstrate a quantitative or market need for a proposal on a site allocated in Policy W10; this is because they have been allocated to meet identified shortfalls in waste management capacity to deliver the objective of net self-sufficiency... the Authorities will keep the allocated sites under review to ensure that they continue to be required to meet identified shortfalls; this will be reported in the AMR."

The Waste Local Plan identifies a shortfall in recovery capacity of 270,000 tonnes per annum (tpa) and allocates strategic sites to meet this shortfall.

The most recent AMR(2018/19) states that there is still a shortfall of 270,000 tonnes. It also refers to 320,000 tonnes of permitted capacity that is not yet operational, but could lead to a potential surplus. This comprises the permitted facility (140,000 tpa) at the application site and the ERF allowed on appeal in February 2020 at the former Wealden Brickworks at Horsham (180,000 tpa).

The applicants state that the permitted facility at Ford will not be built because commercial considerations favour alternative technology. They also state that the Horsham facility has not yet been implemented and that there is no certainty it will be built out. The permission contains many pre-commencement conditions, so it is unsurprising that it hasn't yet been implemented. As it is valid for three years, there remains the prospect that it will be built.

What is difficult to understand is whether there is a need for a facility at Ford of the size proposed in this current application to meet the identified shortfall in West Sussex. This is particularly the case when it is stated in the Waste Local Plan (para. 2.9.3) that the County is a net importer of waste from the rest of the South East and other parts of the United Kingdom.

LANDSCAPE AND VISUAL IMPACTS

The NPPF requires development to be sympathetic to its landscape setting (Para. 127c). Protecting and enhancing valued landscapes is to be pursued in decision making (Para. 170a). Great weight is to be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues (Para. 172). It is important to note that major development not only within, but adjacent to a National Park could have a significant impact on the qualities for which it was designated.

The proposed ERF building would be 128.8m long and 124m wide (including roof overhang) at its widest point. The highest part of the roof would be 38.5m above ground level and there would be two 85m high flue stacks. The previously approved building was approximately 120m x 70m and 22m in height, with two flue stacks of 50m height. Therefore, the proposed building is significantly larger.

The WSTF building would be 60m long and 43.8m wide. The highest part of the roof would be 16.1m above ground level.

The landscape and visual effects of the proposed development are considered in Chapter 12 of the Environmental Statement and in paragraphs 111-131 of the Non-technical summary (NTS).

Paragraph 112 of the NTS describes the site and its surroundings as follows:

"The proposed site is within an established area of industrial land uses, on a former airfield. There are no landscape or national natural heritage designations within the immediate local area. However, the South Downs National Park boundary lies 2.2 km to the north of the site and there are listed buildings at Ford, Yapton and Climping, two conservation areas (at Yapton) and a scheduled monument at Climping, within 1.5 km of the site. The older part of Arundel defined by the conservation area and with a concentration of listed buildings and Arundel Castle (scheduled monument), lies approximately 4.4 km to the north east. There are a number of public rights of way in the vicinity of the site, with one passing adjacent to the northern boundary. There is no significant vegetation on the operational part of the site. Vegetation in the outlying area just beyond the site to the north west, in the control of the applicant will remain as existing. Vegetation outside the site, located adjacent to the site boundary, will not be affected."

Paragraph 117 notes that, within a 1.5km radius of the site, the proposals will be visible from some local residential areas, some public rights of way, local roads, some local workplaces and some views in the settings of heritage features. From the wider area (between a 1.5km and 4.5km radius) visibility will be from some public rights of way in the surrounding agricultural land, some transport links and some of the edges of more distant settlements including rising ground at Arundel. Beyond a 4.5km radius, visibility is predominantly from elevated areas of the South Downs National Park and from parts of the A259 that bridge the railway line near Bognor Regis.

Paragraph 118 states that the character of the site will remain industrial, but the scale will be altered through the introduction of taller structures than the existing. It adds, however, that the quality of the design and materials will improve the overall character and distinctiveness of the site and that this will be beneficial.

Paragraph 119 notes that the proposals will influence the character of the North of Yapton Coastal Plain within which Ford Airfield is located. Although the landscape character area is already influenced by existing industrial development, the size and scale of the proposals will increase the extent of visual influence of industrial elements in the landscape into some areas with currently little or no view of industrial buildings. In those areas already influenced by existing industry, the scale of industrial elements will be greater than is currently experienced.

Paragraph 120 acknowledges that the scale and height of the ERF building and stacks will also result in some degree of influence on the other landscape character areas more distant from the site and also influence the setting of some parts of the South Downs National Park. The assessment of the significance of effects on the South Downs National Park concludes that the effects will be slight to moderate or moderate.

Paragraph 126 notes that for residential receptors and public rights of way users in the local area up to 1.5km from the proposals, the visual effects will be mostly moderate-substantial. For receptors in the range 1.5km - 4.5km from the site, the visual effects will be mostly moderate, except for those receptors located within the more sensitive rural areas north of the site, including parts of the South Downs National Park in and around Arundel, where the significance of visual effects will be moderate-substantial.

The proposed bunding, fencing and planting, described in paragraph NTS.114, is considered unlikely to provide effective screening. The Council's Leisure and Landscape Officer advised that the landscape proposals will go some way to mitigate the immediate environmental and visual impacts, including those of the acoustic fencing. However, planting on the bunds will take considerable time to establish and the development would remain a prominent feature in the landscape during this time and beyond. She also noted that very little space was shown for landscape mitigation on the southern boundary, where only a single row of trees had been indicated.

The Design and Access Statement explains that the overall shapes of the ERF and the WSTF are refined cubic forms. In the case of the ERF, a series of interlocking cubic forms make up the overall building.

Aluminium standing seam cladding is proposed to be the principal external material for the main facades of the buildings. The applicants state that "its matt metallic 'silver' appearance is light and reflective enough to be responsive to different lighting conditions and therefore will best blend the building with a background of sky".

The Design and Access Statement says that a 'form follows function' design approach was adopted.

That is clearly evident in the submitted proposal which remains utilitarian in its appearance.

In chapter 3 of the Environmental Statement it is stated that Scottish and Southern Electricity (SSE) would be responsible for connecting the ERF to the national grid. This company would be responsible for obtaining any permissions or permits required to develop the necessary infrastructure. The route of the cable to the Crockerhill sub-station is described using existing roads, but it is unclear whether the cable would be buried or pass overhead. The environmental impact is likely to be significant if it took the form of an overhead line.

NATURE CONSERVATION

WSCC has already consulted Natural England, who have advised that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes.

CONSERVING THE HISTORIC ENVIRONMENT

ADC's Conservation Officer has noted that the scale of the proposal and the impacts identified in the heritage assessment mean that it will have an impact on the heritage assets. The impact will vary according to the location and nature of the individual assets. Based upon the assessment, it would appear to be at least less than substantial harm in accordance with paragraph 196 of the NPPF and potentially substantial in some cases. WSCC, as decision-maker, will need to consider whether the public benefits of the proposal outweigh that harm.

TRAFFIC AND ACCESS

Access to the proposed development would be via the recently opened service road from Ford Road to the east.

It is proposed that the ERF would operate 24 hours a day, seven days a week, except during periods of annual maintenance. The majority of deliveries and collections would be made between 06:00 and 20:00 hours Mondays to Fridays and 08:00 and 18:00 hours on Saturdays.

The WSTF would also operate from 06:00 to 20:00 Mondays to Fridays and 08:00 to 18:00 hours on Saturdays. No waste processing would take place on Sundays.

The Planning Supporting Statement specifies that the average daily operational HGV movements are forecast to be 109 each way (i.e. 218 HGV movements in total).

The statement adds: "All vehicles will use the existing access road, Ford Road south and the A259. There is an existing s106 (deed of variation) dated 13 August 2019 that addresses the routing of HGVs to and from the site, in the context of the extant planning permission. This agreement also addresses limits on the number of HGVs leaving and entering the site and the hours within which they can do this; the recording of HGVs and reporting to WSCC; and the ability to request alternative routing by prior approval in some circumstances.

The applicants do not propose any changes to the agreed HGV movements or routing arrangements. The applicants are willing to enter into a new s106 agreement to secure the HGV routing, and consider that the number and timing of HGV movements can be addressed in planning conditions."

While there are no proposed changes to the number of HGV movements, it is understood that the size of some of the vehicles would need to increase in order to transport the higher quantity of waste that would be processed. WSCC as local highway authority has commented that all vehicles would be within legal limits and not require abnormal load permission. Nevertheless, vehicle tracking information for the largest anticipated vehicles at the Church Lane junction has been requested.

The Arun Transport Study: Waste Site Allocation Transport Addendum 2014 (prepared as an addendum to the 2013 Arun Transport Study) states at paragraph 2.3.2:

"Strategic Objective 7 of the (Waste Local) Plan aims 'to maximise the use of rail and water transport for the movement of waste and to minimise lorry movements and the use of local roads for the movement of waste.' Where this is impractical, Policy W18 in summary, makes the requirement that:

- Transport links are adequate or can be improved to an appropriate standard without an unacceptable impact;
- Where the need for road transport can be demonstrated:
 - Materials are transported via the Lorry Route Network with minimal use of local roads;
 - Vehicle movements will not have an unacceptable impact on highway capacity and safety;
 - Safe and adequate means of access to the highway;
 - Provision made for vehicle turning, parking, manoeuvring and wheel cleaning; and
 - Vehicle movements minimised by optimal use of fleet."

By virtue of its location, the proposal will neither maximise the use of rail or water transport for the movement of waste nor minimise lorry movements and the use of local roads for the movement of waste. It will not fulfil Strategic Objective 7 of the West Sussex Waste Local Plan which seeks to minimise the impact of road transport on local communities and rural areas.

AIR QUALITY

Operators of waste incinerators are required to monitor emissions to ensure that they comply with specified limits for a range of pollutants. Under the Environmental Permitting Regulations 2010, the operator is required to apply for an Environmental Permit from the Environment Agency (EA). The Environmental Permit will set out the operating requirements that must be complied with to protect the environment and public health.

An application for an Environmental Permit for the proposed ERF has been submitted to the EA. It is currently the subject of a separate consultation with Arun District Council.

The NPPF states (para. 183) that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions are to assume that these regimes will operate effectively.

The supporting statement explains that emissions from the flues would be continuously monitored using a continuous emission monitoring system and reported in accordance with the EA's requirements for operation of the facility. Additionally, periodic monitoring would be undertaken of pollutants that are not able to be monitored continuously.

Public Health England's risk assessment is that "modern, well run and regulated municipal waste incinerators are not a significant risk to public health. While it is not possible to rule out adverse health effects from these incinerators completely, any potential effect for people living close by is likely to be very small. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that these incinerators make only a very small contribution to local concentrations of air pollutants.

The Environmental Health Officer has raised a number of specific questions related to Chapter 6 of the Environmental Statement which deals with Air Quality, Dust and Odour. While the statement has considered the human health effects on existing receptors, additional information is sought in relation to the future residential use of the adjacent site.

ODOURS

The proposals include various controls to minimise odour during operations. All wastes received at the ERF would be unloaded inside an enclosed waste reception hall. The waste reception hall and waste bunker areas would be retained at negative pressure to minimise odour escaping from the building. Doors would be kept shut when there are no waste deliveries occurring and there would be no external storage of waste.

NOISE

It is noted that the majority of equipment with potential to create noise would be accommodated inside the main ERF and WSTF buildings. A combination of landscaped bunding and 2.4m - 5m high acoustic fencing is proposed to be installed between the operational area and the site boundary. Additionally, the site layout has been designed to feature a one-way vehicle circulation system, reducing the need for reversing vehicles and reversing alarms.

The Environmental Health Officer has raised a number of specific questions related to Chapter 14 of the Environmental Statement which deals with noise. The questions relate to the assessment methodology, the impacts of noise during both construction and operational phases, the impacts of night-time operational noise and the uncertainty of impacts on future residents occupying homes on the adjacent site. The officer also has concern about the potential impact of noise upon users of the adjoining playing fields at the Arun Sports Arena.

LIGHTING

The Institute of Lighting Professionals - Guidance Notes for the Reduction of Obtrusive Light - Table 1 recommends that local planning authorities specify zones for the control of exterior lighting. The Environmental Statement (Ch.3, para. 3.47) states that lighting has been designed in accordance with the environmental lighting Zone E3 and to Zone E2 within 8m of the site boundary (suburban/rural). The previous proposal had been designed to accord with Zone E3/E4 (suburban/urban). This change is welcomed and responds to earlier comments made by the Environmental Health Officer.

PROTECTION OF WATER RESOURCES AND FLOOD RISK

The location of the site within a high vulnerability zone of a principal aquifer and potentially high groundwater levels mean that sustainable urban drainage systems (SUDS) are not a practical option for dealing with surface water runoff. Therefore, it is proposed to be directed into cellular storage tanks prior to being discharged at greenfield runoff rates into a land drain to the east of the site.

The site is in Flood Zone 1 and is largely at very low risk of surface water flooding, although there are small areas of low to medium risk in the west and north.

POTENTIAL LAND USE CONFLICT

Several matters (visual impact, air quality, odour and noise) have already been identified where there is potential for conflict between the proposed development and the surrounding strategic housing allocation.

SUMMARY

Arun District Council welcomes the safeguarding of existing employment, new jobs, training and educational opportunities that the proposed development has the potential to offer. It also welcomes the possibility to provide heat and power to local homes and businesses. The Council continues to encourage discussions between the applicants and potential users of the heat and power in the vicinity of the site, particularly the opportunity for the housing, education facilities and employment on the adjacent Ford strategic allocation.

The proposal is to treat non-recyclable waste that would otherwise have to go to landfill or to treatment facilities further afield, which is not sustainable in the longer term. The movement of waste up the waste hierarchy and away from landfill is supported. The recovery and treatment of waste is preferable to the continued disposal of waste to landfill sites. The Council supports the contribution that this facility would make towards this objective, provided that there is a proven need for the facility to achieve net self-sufficiency for waste management in West Sussex.

The Council recognises that the proposal doesn't seek to increase HGV movement over that already agreed and this is welcomed, provided that a renewed traffic management plan is put in place to ensure that agreed routes and delivery times are adhered to. Any cumulative traffic impacts should also be fully assessed, and appropriate mitigation provided.

However, it is recognised that the proposed building and stacks are of a size and scale which cannot be completely screened. The impact on the landscape, both locally and in relation to the views from the South Downs National Park, is considered to be unacceptable. A new 'landmark building' on the coastal plain will only be supported if it is of the highest quality in terms of design and appearance. This has not been demonstrated or that the building and stack size is the minimum required for it to function. Whilst the National Design Guide is focussed mainly on housing development, the principles of good design should be applied to ensure that the form, scale and appearance of the building and materials used, are all of the highest quality. The landscaping of the site as a whole will be important to ensure that there is an appropriate relationship between this site and the Local Plan strategic allocation that surrounds it. The proposed soft landscaping in this application remains inadequate.

There are some outstanding concerns in relation to noise, air quality and odour. The Council require that the Ford strategic allocation is considered fully in this application, as the health and well-being of future residents, as well as existing residents, is important. Likewise, the Ford strategic allocation Masterplan and outline application needs to consider the waste management proposal to ensure that the uses can co-exist in the future without detriment to the amenity of residents or the operation of the waste facilities.

RECOMMENDATION:

It is recommended that an OBJECTION be raised to the proposal for the reasons set out below.

- The need for a facility of the proposed size, to enable West Sussex to achieve net self-sufficiency in waste management, has not been clearly demonstrated;
- The scale and height of the proposed development will have a significant adverse visual impact on the character of the landscape, on local settlements including the town of Arundel and on the South Downs National Park;
- It has not been demonstrated that the scale, form and appearance of the proposed buildings are of the highest quality;
- The amount and scale of development proposed for the site is too large to enable a comprehensive and effective landscaping scheme to be implemented;
- The cumulative impact of traffic on the local highway network, taking into account all existing, permitted, allocated or proposed development in the area, has not been satisfactorily addressed;
- The submitted noise assessment has not adequately considered all existing sensitive receptors or the whole of the surrounding strategic housing allocation;
- It has not been demonstrated that odour would not be a problem at sensitive receptors nearby, including the surrounding strategic housing allocation; and
- The proposal has not been designed in a comprehensive and co-ordinated manner to avoid potential conflicts with the surrounding strategic housing allocation.

Should West Sussex County Council be minded to grant planning permission, Arun District Council

would request the imposition of conditions to secure the following:

1. The use of only white sound reversing alarms for vehicles on the site;
2. Deliveries to the site during specified hours only in both the construction and operational phases;
3. Mitigation measures to accord with the Air Quality and Emissions Mitigation Guidance for Sussex (2020);
4. Improved cycle and pedestrian access;
5. The use of electric vehicles on the site where possible;
6. Dust management plans to cover both the demolition/construction phase and the operational phase;
7. A scheme to deal with the risks associated with contaminated land; and
8. A comprehensive landscaping scheme.

In the event that West Sussex County Council is minded to approve the application, Arun District Council should request the Secretary of State to call-in the application for his own determination because it is clear that the proposed development:

- Will conflict with national policies on important matters;

The scale and height of the proposed development will have a significant adverse landscape and visual impact on the South Downs National Park contrary to paragraph 172 of the National Planning Policy Framework (NPPF).

- Will have a significant long-term impact on economic growth and meeting housing needs across a wider area than a single local authority;

The proposal will be detrimental to the local planning authority's ability to deliver housing at the adjoining and nearby strategic allocations in the adopted Arun Local Plan 2011-2031 with associated consequences for the wider housing market area.

- Will have significant effects beyond the immediate locality;

The proposed development would lead to waste being transported to Ford from other parts of the south east region, over greater distances on an inadequate highway network. The proposal fails to maximise the use of rail and water transport and minimise lorry journeys for the movement of waste.

- Raises significant architectural and urban design issues;

The proposed buildings are not of the highest design quality in terms of their form and appearance, particularly in the context of a sensitive location adjacent to a National Park.

RECOMMENDATION

OBJECTION