

Dear James

I have previously made my comments on this application (copy attached) and would request that they be taken into consideration in this environmental assessment.

It is a well know ploy for developers of large and unpopular proposals to keep making minor changes and repeat applications until they wear down the objectors and a lesser number of objections are received. I do hope you are alert to this?.

Pretty much all of the points of my objection have an environmental context anyway and the whole proposal would represent an environmental disaster for Ford, Clymping and its wider environs.

I have also attached a copy of a traffic impact review I did for the adjacent Ford Airfield site. Clearly the two proposals could not go ahead side by side anyway, but I hope you will find my highlighted comments on the environmental impact and assessment of road traffic, particularly hgv traffic, interesting and relevant. This approach has been ignored so far but is actually very important in the context of the narrow lanes which surround both developments and for which there are no mitigating measures currently proposed.

I trust that you will take another look at what I have said and that all my objections will be put forward and duly considered by the planning committee?

I would like your reassurance that the particular issues that I have raised will be put before the Committee when it eventually considers this Application.

Regards,

Alan Lovell MSc. C.Eng. FICE. FCIHT (Past County Engineer & Surveyor WSCC)

Comments on WSCC's internal Highways and Traffic Report on: the impact of Application WSCC/036/20, dated 11th August 2020

Update on 16th April 2021

Introduction: The potential impact of the increased traffic volumes (particularly HGVs) resulting from the construction and use of this new, major (275000 +20000 tonne) waste incineration and recycling facility has been a widely cited reason by local residents for objecting to this application. There are of course many other significant reasons why this development should not be approved, but they are dealt with separately in my submitted objection.

WSCC produced an internal consultation report (August 2020) on the highways and traffic implications of the earlier, but similar application. This paper explores that report and comments on it.

Context: This is particularly important matter for Climping village and its surroundings because this application follows earlier approvals by WSCC (as mentioned in the WSCC report) and a number of other approvals given by Arun DC as the local planning authority, which are not mentioned. This author is aware of many recent planning applications affecting this village and they should be noted as the context in which this new application must be set as they are a material consideration to it. Those other applications that I am aware of include:-

1. The two earlier applications on this site already mentioned and which would be superseded by this much larger proposal (a doubling in size)
2. The 1500 home housing development on the adjacent Ford airfield site (still with unresolved highway and traffic issues)
3. The 300 home development proposed on the field (known as the Mulgrave devt.) at the junction of Church Lane and the A259 (also with unresolved access issues)
4. The proposal to close the Yapton Road access point for the popular Ford Market and bring all the traffic in via Ford Road (creating major local traffic implications).
5. A number of other housing developments in the Yapton area amounting to around 500 +new homes
6. A recently approved concrete crushing plant (off Yapton Road)
7. A possible crematorium facility with access from the A259
8. A number of other smaller housing developments, a possible residential care home for dementia sufferers and a holiday caravan site (all with their own highways implications.)

It is important to note that so far none of these developments have drawn an objection from WSCC on traffic grounds and their comments have, for the most part, concerned only

the direct access points to these sites from the adjacent highway , usually in the form of a new or improved junction)to provide access, but little else.

In every case WSCC officers conclude that the existing local road system is adequate to cope with the ever increasing volume of traffic generated by each of these proposals, and cumulatively by them all. It is this point that leads me and many others to challenge the outcome of the technical appraisal being used by WSCC to assess these applications and the conclusions being drawn from them.

The WSCC Consultation report: This report follows a pretty standard WSCC practice. It considers the access point to the site (off Ford Road), 'Sustainable Transport' (walking, cycling . horse riding), the applicants' assessed trip generation and traffic modelling, personal injury accidents, and makes comments on them all. Its broad conclusions are that Ford Road and Church Lane (and their junctions) have adequate daily and peak hour capacity and that there is no objection to be made.

Initial Comments: there is a major flaw in this report in that it considers only numbers of vehicles (i.e expected vehicle flows) and the theoretical traffic lane capacity of the nominated access roads (A259, Ford Road and Church Lane). This leads them to conclude that since the total amount of peak hour traffic would be within the theoretical lane capacity it is acceptable. And no objection should be made.

But there is a major flaw in this approach as nowhere **does it concern itself with the concept of 'environmental capacity'**, which is a more complex issue. There is no direct or standard way of assessing the environmental traffic capacity of a road or lane that I am aware of, but that does not mean it can or should be ignored as it is extremely important to the local community and its environment..

'Environmental Capacity' is not a new concept and many learned papers have been written about it dating back some forty years. To explain, **Environmental Capacity is about making a qualitative evaluation of a particular road or street and its immediate environment; and then making a judgement on its suitability for the traffic loading it is carrying either now, or is likely to carry in the future.**

This type of assessment would include consideration of issues such as air quality, noise and vibration, safety matters, the immediate built and natural environment and any other matters of perception that are likely to affect the people who live in, work in or visit the area. **It is fundamentally about quality of life and sustainability.**

The environmental assessment would typically also include an analysis of the composition of the traffic using the road. For example, numbers of cyclists, pedestrians and crucially, the numbers of commercial vehicles and their size. HGVs do of course have a much greater visual impact than ordinary cars and their pcu rating ('passenger car unit') can be as much as

4 times that of a single car. They have a much greater visual impact and very much affect the 'feel' of the area through which they pass.

The WSCC report is totally silent on this and yet it is the kind of thing that is usually taken into account when assessing the need for new infrastructure such as traffic management or calming schemes and speed limits and in assessing the need for, and impact, of bypass schemes. **Environmental impact is not just about flora and fauna, it is about the impact of vehicular traffic on people and their lives, and the places they live in.**

The traffic modelling and assessment: The report notes that the junction modelling *'includes all consented developments and local plan allocations....and considers the cumulative impact...'*. But then draws a conclusion about only *'the junction'* which is presumably the site access point onto Ford Road, where they say the impact would not be severe.

There is no specific mention of the quantitative or safety impact on the Church Lane junction with Horsemere Green Lane, which is actually of major concern to local residents and is regarded as a genuine hazard now. This is a major omission notwithstanding the fact that it has no recorded personal injury accidents. Local people are well aware that there have been plenty of 'damage only' accidents due to the poor visibility in either direction for traffic emerging from HGL. And as traffic flows increase the situation will undoubtedly worsen. Yet this junction has been totally ignored by both the applicant and by WSCC.

The WSCC approach and history: The present WSCC report notes that the, *'level of trips generated (by the new development) would not result in a severe impact'* on the Church Lane/A259 junction', and also that, *'the junction is identified for improvement within the Arun Local Plan and a larger mitigation scheme has been secured.'*

This is interesting because the traffic modelling carried out for the Arun Local Plan produced a result which WSCC claimed, at the Local Plan Inquiry back in 2017, that the junction would require only a minor lane widening on one arm of this junction. Their own assessment also acknowledged that this junction, and others along the A259 are already operating at capacity during peak periods and this is borne out by the daily queues that form along the A259 in peak periods.

But **despite this** WSCC did not propose any improvements for any of these junctions as part of the development plan, not even those with known safety problems like the Oyster Catcher and Comet corner junctions. This outcome hardly instills confidence in the WSCC approach and it is only subsequently that they have reached the conclusion, pointed out at the inquiry, that all the junctions along the A259 between Wick and Flansham really do need improvement. Hence the current WSCC study into options for improving all of these junctions and the belated attempts to seek funding for them. Funding which might have come from development if they had reacted more quickly to safeguard the public interest.

HGV numbers: the applicant claims that number of HGV movements would be exactly the same (240 movements per day) as the earlier and smaller proposals which were approved (despite local objections). WSCC appear to have accepted this notwithstanding the fact that the new facility would have almost twice the waste handling capacity of the existing approval. And of course we cannot be sure that in future years the volumes might increase further and come from even further distances from the site. Who will monitor it effectively? WSCC?

Apparently, the developer has claimed that lorries to and from the new plant would be larger and hence total numbers of vehicles will not increase. So is using even larger lorries a benefit to the local community? And is the claim realistic anyway? Subjectively, using a simple scaling up of the change in expected waste volumes produces an operational HGV number more like 400 to 500 lorries per day (not 240) , and all using Ford Road/Church Lane as there is no other access road to the site. That would be an average of about 40 to 50 ADDITIONAL lorries per hour (two way) travelling along Ford Road/Church Lane. That would be a constant stream of just under one lorry per minute. It must be considered a huge new impact onto what is just an unclassified country lane. And yet the new application says, that this is not significant , “ given the low sensitivity of the roads.” This is an entirely different conclusion from that taken by the people who actually live in this area and use these roads on a daily basis.

Sustainable Transport: this is covered in the report but the conclusions are not encouraging. It claims that there are no dedicated facilities *'within the study area'*, (so what was the study area?). It also notes that the southern part of Church Lane to the A259 is *'part of the south coast cycle route'*. But in fact the existing road is much too narrow to provide a dedicated cycle way, or even a central island to help people crossing the road, so cyclists routinely ride on the narrow footway now, rather than risk their lives on the carriageway.

The report concludes that *'there are limited opportunities for the development to improve pedestrian and cycle access'*. **That is not correct either and is actually another reason for objecting to the application. The Climping Parish Council have long campaigned for a widening of the single footway in Church Lane , a proper crossing point for pedestrians and cyclists (there is nothing at the moment) and a controlled junction at HGL/ Church lane to allow safe access. None of these points feature in the WSCC report even though the new levels of traffic generation will undoubtedly worsen an already poor situation.**

I would also highlight the point that this part of Church Lane is central to the character and functioning of Climping village . Church Lane contains the local 13th Century Church, has two village halls and the Climping sports field whilst also being the main access way to the local school and the well used Climping beach. In addition Ford Road is the location of Ford Prison with its own Pelican crossing in use throughout the working day, and provides access to the local railway station. None of this is mentioned in the WSCC report and yet this is the environment into which an additional 250 to 400 more very large lorries are to be

introduced on a daily basis; and I would link this omission to my earlier point on Environmental Capacity as a material consideration, which it clearly is.

Conclusion: The WSCC report is, in my view inadequate and disappointing because it fails to take account of many traffic impact issues that will undoubtedly adversely affect Climping village, its surroundings and the people who live and work here.

Of particular concern is the absence of any investigation whatsoever into the environmental effects on the community as I have described above. These are undoubtedly a major part of the 'traffic impact' and should be included in the analysis and its evaluation. Of the proposed energy from Waste proposals.

A personal comment: Unfortunately we have come to expect a 'no objection' response from WSCC highways for many years now and the community feel very let down by that, and believes that WSCC are not performing their duties in the way that they should to both recognise and defend the interests of the local community whenever major new developments are being considered. This latest WSCC report is, regrettably, a further example of that.

Alan Lovell - MSc. C.Eng, FICE, FICHT (former WSCC County Engineer and Surveyor)

24th August 2020_(updated 16th April 2021)

Planning Application WSCC/011/21

EFW Plant (Incinerator) at Ford by Grundon and Viridor - July 2020

Objection and comments from A.J. Lovell MSc. C.Eng, FICE FiHT (Retired)

Initial remarks:

1. This Application is the replacement for the earlier WSCC/036/20 which was subsequently withdrawn following a huge number of objections on a whole range of relevant planning issues. This new application is claimed by the applicant to have a "significant" number of changes including: - site layout, building footprint and design, height and landscaping.

The reality is very different:-

The application is for exactly the same purpose (burning waste to create energy); the same volume of material 275000 tonnes of waste plus 20,000 tonnes for recycling; the same amount of lorry traffic; the same environmental impact; two rather than one chimneys of the same 85 metre (276 feet) height; and the reduction in building size is in truth insignificant as its visual impact will be similar. (Length 133m instead of 176m, width 132m instead of 134m, height 38.5 metres instead of 51.2).

On reading the submitted 'Non –Technical Summary' I find that in their view this enormous waste processing plant will have almost no impact on any of the matters that concern the people who live in and around this area. Frankly, it beggars belief and inevitably leads me to question the veracity of the whole submission as it misrepresents on so many issues. [I will explain more on this in the remainder of this statement of objection.]

N.B.I would therefore suggest that all of the points made by the many objectors to the previous submission hold equally to this one and should therefore be considered as relevant. This is important because many people not familiar with the planning system may well assume that as the application is virtually the same, their previous objection should be sufficient.

The substance of the objection

As before, my objections are under the headings of:

- unsuitability of location (flat coastal plain surrounded by farmland and housing)
- scale and height of building (extensive visual impact)
- traffic movements (scale of impact)
- access roads (a fundamentally unsuitable local road network)
- other potential environmental impacts

Beyond these basic planning issues I would also question both:

- a) the need for this facility at all, does West Sussex actually require this additional capacity to deal with its own waste, especially in the light of the recently approved new site at Horsham?
- b) And, the suitability of burning waste to create energy in a rapidly evolving energy market and the government's intentions to develop more green forms of energy?

These are more fundamental issues for WSCC , as waste disposal authority, to consider but they are of course very relevant to any decision to allow this application to proceed, or to reject it.

This application is quite simply a classic example of a commercial waste management company seeking to provide a major new facility in a totally unsuitable area and requiring the delivery of waste from a huge surrounding area outside of West Sussex (from Southampton to the border with Kent) in order for it to be financially viable. It will irrevocably impact badly upon, and damage, the areas for several miles around and must be rejected.

Points for Objection

1.Location:

The proposed site is surrounded by an area that is largely rural farming country with the relatively small villages of Climping, Yapton, Ford and the western fringes of Littlehampton close by. It also abuts the Rudford Industrial estate but this is quite small and has no major businesses, certainly nothing anything like the scale of what is now proposed.

In addition, and significantly, we have the proposed 1500 home residential site planned for the Ford Airfield which is immediately adjacent to the Incinerator site. This is contrary to WHO guidelines.

Thus the whole surrounding area may be characterised as semi rural, though the new airfield development will change that to some extent. It is also adjacent to the South Downs Country Park and close to the historic town of Arundel.

The new building is of such a size (see next point) that it will be visible for many miles and will be the dominant feature in the views from the south downs, just as Arundel Castle and Cathedral are from the south at the moment. But what a hideous comparison that would be!

2. Scale and height of buildings:

The size of the 'new' main operational building has been scaled from the plans as:
Length – 133 metres, width – 122 metres , height 38.5 meters, plus twin stacks (chimney) each 85 metres tall.

This is just the main building, not the whole site which far larger and contains other smaller buildings.

For comparison, the height of the main building is about the same as a 13 storey high block of flats.

And the height of the chimney is about 263 feet tall or about the same as a 26 storey block of flats.

There are no other buildings of a comparable size for miles around. At present the main features on the wider landscape are the gas storage tanks at Littlehampton and the Kingmere block of flats, also at Littlehampton which is about the same height as the proposed processing building. Many people regard that as a regrettable 'blot on the landscape' and a big planning mistake!

There can be no doubt that a building of this size will dominate the views of the whole area which is currently unspoiled by anything tall, and this helps to retain its rural character.

The visual impact of this new building would totally change that and damage the character of the whole surrounding area and all the villages within it.

3. Traffic movements and access roads:

Catchment area: First we must recognise that waste material would be imported not just from West Sussex, but also from all the surrounding Counties listed in the submission as: East Sussex, Hampshire, Surrey and the major towns of Portsmouth, Southampton and Brighton.

So some vehicles will travel quite long distances through West Sussex in order to bring their waste to be processed in this relatively quiet corner of this county. That makes no sense at all unless you are the company deriving its profitability from such a wide catchment area. Just think of the additional miles travelled every day throughout the county.

And then there is the future? We have already seen how the applicant will ask for one permission and later seek to upgrade it to something larger. Whilst WSCC could well turn down a future expansion, who can tell what a future planning appeal decision might bring?

Traffic volumes: The application estimates the lorry numbers to be about 240 hgvs a day ,but I understand that this is the same figure as that given when the earlier permission for a much smaller plant was granted. Using a scaling up from the earlier waste tonnage to the proposed 295000 tonnes per year (275000 + 20000 recycling) I would estimate that the daily number of lorries could well be much larger than the applicant's estimate of 240, to perhaps 400 hgvs each day onto a narrow, unclassified, country road. In addition there would be the ordinary vehicle movement of staff (40 people on 4 shifts per day) and the visitors which might include coaches for schoolchildren or other visitor groups. All of this makes the operator's traffic estimates look very questionable and could make the traffic impact very much heavier than they claim.

The applicant says that they will use much larger lorries to keep the vehicle numbers down but it must be questionable whether they can actually control the size of all the incoming vehicles, and in any event, who would want even larger lorries on what are essentially country lanes?

4. Road access:

The **only** road access suggested by the applicant (or indeed possible) is via the A259 and Church Lane./Ford Road. They make no proposals whatsoever to improve the local road infrastructure apart from improving the junction of their plant access road onto Ford Road.

Ford road/Church Lane is a single lane road which runs through the heart of Climping providing the main local route for private cars, cyclist, pedestrians and cyclists to the local church, playing field, two community halls and the local school, and of course the wider area.

The road currently has a 40mph speed limit which is constantly exceeded at off peak times (we have the speed monitoring figures to prove that with a maximum measured speed of an unbelievable 100mph recorded one afternoon). During the evening peak period the restricted capacity at the roundabout junction with A259 causes extensive southbound queuing in Church Lane which can extend as far back as Ford Prison and causes extensive delays and air pollution.

Church Lane currently has a single, narrow footpath only on the east side and no crossing facilities at all. When large commercial vehicles pass close by a pedestrian there is a frightening suction effect which makes it feel very unsafe. Cyclists also use the footpath as the narrow carriageway is not safe for them.

Then we have the dangerous junction of Church Lane with Horsemere Green Lane which is frequently used as a cut through by traffic going to the Rudford Estate and also by drivers wishing to avoid the dangerous junction at the Oyster Catcher. This junction is considered dangerous because of its poor visibility in either direction for vehicles emerging from HGL, combined with the potential speed of traffic on Church Lane. Most collisions that occur here are 'damage only' so are not recorded on official statistic, but there are plenty of them.

As members of the planning committee read these notes (as I hope they will) there can be little doubt about the unsuitability of the road as the main access to a new waste facility generating somewhere between 240 and 400 additional , large hgv's per day, or SOME 25 to 40 EVERY HOUR!

This factor alone should be enough to justify a refusal and yet the applicant concludes that Quote from NTS.153, " THIS IS NOT CONSIDERED TO BE SIGNIFICANT GIVEN THE LOW SENSITIVITY OF THE ROADS".

It's quite unbelievable really and is a good example of how this applicant is totally dismissive of anything that might stand in their way.

NB. I have also carried out a review of the WSCC Highways and Traffic Report on Impact of the previous application dated 11/08 2020. I produced a number of comments on its inadequacies in reaching its 'no objection' conclusion and will attach my review to be considered alongside this objection.

5. Potential environmental impact:

It is widely recognised that the incineration of all kinds of commercial waste produces a range of noxious gases and also highly toxic dioxins. The applicant stresses how their plant will have the latest technology to clean and filter out all of these things which are damaging to both humans and the environment they live in.

This maybe so, or it may not be, but it is apparent that a pair of 275 foot high chimneys is required to try and get the emissions away from the surrounding area. I suspect that wind and atmospheric changes could have quite an effect on that. And what would happen if there is a plant failure, maybe one that is not spotted straight away? Or if the monitoring is not quite up to scratch?

N.B. Beyond that the recent 'Dispatches' tv programme on Ch. 4 drew attention to how the incineration of waste to provide energy is now regarded as old technology and needs to be phased out as it is second only to coal in the amounts of emissions that it produces. They also highlighted how much of the collected 'recyclable' waste ends up being burnt because it is either contaminated or there is no outlet for it. This can be anything up to 40% of the 'recyclable' material. Thus large quantities of plastics go to incineration and produce some very toxic emissions.

They concluded that "Incineration should be a method of 'last resort' as it has become one of the dirtiest ways of creating new energy."

Clearly there are further questions to be raised on potential environmental impact and the Committee should ask itself, " why would you put a plant like this so close to many residential areas, including a new 1500 home site right next door?"

Conclusion:

I think it should be clear by now to all who read this that this vast new waste incinerator is totally unsuited to the location the its promoters have chosen for it. This is why I and so many others are objecting strongly to it on what I believe are solid planning reasons.

Any one of the above points ought to be enough for a rejection on their own, but considered all together the logical decision must be for a rejection. I do so hope we are not let down!

V1 16th April 2021