

Recommendation Report for County Matter Consultation

REF NO: F/12/18/WS

LOCATION: New Circular Technology Park (Former Ford Blockworks)
Ford Airfield Industrial Estate
Ford
Arundel

PROPOSAL: New access road - This application is a County Matter Waste Application & will be determined by West Sussex County Council (EIA)

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	As above. West Sussex County Council has specifically requested the comments of the Council in respect of Environmental Health. This planning application is a re-submission of the planning application submitted to WSCC by Grundon in June 2017, and subsequently withdrawn in June 2018. It seeks planning permission to build a new access road to the Ford CTP site that would link the site to Ford Road via an existing service road. At the same time, Grundon is seeking to increase the permitted number of HGV movements visiting the site and the permitted hours within which waste deliveries can occur. Whilst these restrictions (along with the new Lorry Routing Agreement) would be formalised within a separate legal agreement under Section 106 of the Town & Country Planning Act 1990 (as amended), their potential impact and environmental effects have been assessed in the form of an Environmental Statement (ES) Addendum to the original 2013 ES carried out in support of the waste treatment facility.
TOPOGRAPHY	Predominantly flat
TREES	None of any significance affected by the proposed development.
BOUNDARY TREATMENT	Fencing/hedging to field boundaries
SITE CHARACTERISTICS	The Application Site is located on the former Ford Airfield land, parts of which have been developed for industrial uses that are often centred on former aircraft hangars. The remaining areas of the airfield are in agricultural use. Part of the Site (the new section of the proposed access road) is currently part of an agricultural field, which runs alongside (to the east of) the WWTW site, with the remainder of the field to the east. The remainder of

the Application Site is the existing access road serving both Southern Water WWTW and Viridor's MRF site, until the point where it meets the public highway (Ford Road) to the east

CHARACTER OF LOCALITY

Rural location

RELEVANT SITE HISTORY

F/22/15/WS	Application for approval of matters reserved by condition imposed under F/16/12 (WSSC/096/13/F) relating to condition No. 13 - Construction Management Scheme. This application will be determined by West Sussex County Council.	No Objection 14-01-16
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In 2015, Grundon Waste Management Limited (Grundon) gained planning permission for the development and operation of a waste treatment facility at the Ford Circular Technology Park (CTP) site, located on the land of the former Ford Blockworks, which is situated at the Ford Airfield Industrial Estate, Ford, near Arundel, West Sussex (consent no. WSSC/096/16/F dated 9th January 2015).

The proposed facility would handle 200,000 tonnes of waste per annum (tpa), of which 60,000 tpa would be processed and recycled through a Materials Recovery Facility (MRF), whilst the residual fraction (140,000 tpa) would be processed by the Residual Waste Treatment Facility (RWTF) to recover energy in the form of electricity and heat.

REPRESENTATIONS

None

COMMENTS ON REPRESENTATIONS RECEIVED:

None

CONSULTATIONS

Environmental Health

CONSULTATION RESPONSES RECEIVED:

ADC ENVIRONMENTAL HEALTH

Noise

The residents to the west of the site, at Rollaston Park will undoubtedly benefit from this proposal with a reduction in HGV movements and therefore a reduction in noise levels. However, the proposed access road directly bisects one of the Council's Strategic Development Sites (SD8) which is designated for residential purposes and is shown in the Arun Local Plan adopted on 18th July 2018. Therefore EH have concerns that although the land directly adjacent to the application area is currently not residential, it will be in the future, and application has not taken account of this, or of any impacts that the proposal may have on future residents.

Air Quality

In principle the AQ info is reasonably comprehensive and could be let through as it stands. However, the

application was submitted in June this year and relies on an EIA some 12 months prior to this date. The non-technical summary also alludes to the findings of the AQ Assessment carried out in 2013, so probably five/six years out of date by now. There has been a sea-change in the national AQ regime in the last 12 months as the health impacts of Particulate and NOx air pollutants has come to light. The reliance on diesel fuelled vehicles has also been shown to have exacerbated these factors, albeit focussing on Carbon reduction targets.

They reference the Sussex Air Guidance in their EIA, which was right and proper at the time, but this document is being revised as it too dates back to 2013 and the mitigation measures it espouses are now recognised as woefully inadequate. Their EIA shows that restricting the site access to the new route will benefit residents to the west of the facility. This is achieved by (before even accounting for their proposed increase in vehicle movements and timings) by doubling the movements through Ford, thus adversely impacting residents there.

A proposal of this nature cannot easily second-guess shifts in this rapidly moving field and, as mentioned, is reliant on old information. In recognition of this I recommend that the minimum measures that could additionally be undertaken would be to maximise the site's potential for alternatively fuelled vehicles - both during the construction phase and in the operational phase. When operating, this would include transport plans to promote and encourage the use of electric or similar vehicles by the fleet as well as staff, and the provision of on-site EV suitable charging facilities.

It is therefore recommended that no objections are raised to the proposal but the environmental health officer has requested conditions are imposed on any approval.

COMMENTS ON CONSULTATION RESPONSES:

Comments noted

POLICY CONTEXT

Designation applicable to site:
Outside Built Up Area Boundary

DEVELOPMENT PLAN POLICES

SDSP1	SD SP1 Sustainable Development
ECCSP1	ECC SP1 Adapting to Climate Change
TSP1	T SP1 Transport and Development
HERSP1	HER SP1 The Historic Environment
HERDM6	HER DM6 Sites of Archaeological Interest
QEDM1	QE DM1 Noise Pollution
QEDM2	QE DM2 Light pollution
QEDM3	QE DM3 Air Pollution
QESP1	QE SP1 Quality of the Environment

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

POLICY COMMENTARY

The Development Plan consists of the Arun District Local Plan 2003, West Sussex County Council's Waste and Minerals Plans and Made Neighbourhood Development Plans.

A new local plan is in preparation and is a material consideration when determining Planning Applications. At this stage the Arun District Local Plan 2011-2031 (Publication Version) October 2014 and supporting documents were submitted for independent examination on 30 January 2015.

A number of Main Modifications to the Arun District Local Plan 2011-2031 (Publication Version) October 2014 were approved by the Council on 22nd March 2017 and consultation on these has taking place. The Main Modifications should be read alongside the Arun District Local Plan 2011-2031 (Publication Version) October 2014 and where there are changes the Main Modification. The examination was completed in September 2017.

The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Neighbourhood Development Plan

Where applicable, Neighbourhood Development Plan's (more commonly known as a neighbourhood plan or NDP), once made by Arun District Council, will form part of the statutory local development plan for the relevant designated neighbourhood area. Whilst an NDP is under preparation it will afford little weight in the determination of planning applications. Its status will however gain more weight as a material consideration the closer it is towards it being made. Arun District Council will make reference to an NDP when it has, by the close of planning application consultation, been publicised for pre-submission consultation (Reg.14).

Made Plans in Arun District Council's Local Planning Authority Area are: Aldingbourne; Angmering; Arundel; Barnham & Eastergate; Bersted; Bognor Regis; Clymping; East Preston; Felpham; Ferring; Kingston; Littlehampton; Rustington; Walberton; Yapton.

Ford Parish Council is currently in the process of preparing its Neighbourhood Development Plan. The last version of the Plan is the "Ford Parish Council Neighbourhood Development Plan 2017-2031 - Submission Plan" which was published in May 2017. Policies SA1, EE1 and BUA1 are considered relevant.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

It is considered that there are no other material considerations to warrant a decision otherwise than in accordance with the Development Plan and/or legislative background.

OTHER MATERIAL CONSIDERATIONS

It is considered that there are no other material considerations to warrant a decision otherwise than in accordance with the Development Plan and/or legislative background.

CONCLUSIONS

The development proposed as part of this planning application is effectively four-fold and consists of the following:

- The construction of a new access road to link the Ford CTP site (from the south eastern corner of the site) to the existing access road serving both Southern Water's Ford WWTW and viridor's MRF, then leading onto Ford Road;
- A new lorry routing to reflect the new access arrangements to and from the site via the proposed new access link road;
- An increase of the limit in the number of HGV movements entering and exiting the site via the proposed new access link road; and
- An increase of the limit in the hours within which waste deliveries can occur.

The closest residential properties to the Application Site are houses off Ford Road some 130m to the south east (properties on Nelson Row) and houses along Rodney Crescent, some 100m to the north. These are located to the south of the junction between the Application Site and Ford Road.

The Environmental Health Officer has provided the comments as set out in the consultations section of this report.

It is therefore recommended that no objections are raised to the proposal but the environmental health officer has requested that the following conditions are imposed on any approval:

- restricting all vehicular access to and egress from the the facility to the new road only
- Requiring a Transport Plan from the facility operator that identifies their (phased over the medium-term if necessary) approach to replacing their fleet with low to zero emission vehicles
- The said plan will also identify their short-term approach to encouraging staff to switch to low-or zero-emission vehicles, together with provision for suitable, on-site electric vehicle charging.

RECOMMENDATION

NO OBJECTION