

REPORT UPDATE

Application No: F/15/20/WS

Reason for the Update / Changes

The application was discussed at a special meeting of the Ford, Yapton & Clymping Advisory Group on 25th August 2020. This Update summarises the steer given by the Advisory Group and it clarifies the recommendation.

STEER FROM YAPTON, FORD AND CLYMPING ADVISORY GROUP

The Yapton, Ford and Clymping Advisory Group supports the officer recommendation to Object to the application and has undeniable concern about the proposed development for the following reasons:

- Impact of traffic during construction and operational phases;
- The impact upon Arundel and communities in the wider area, in addition to villages of Ford, Yapton and Clymping;
- Light pollution and impact on dark night skies;
- Noise levels in a rural location;
- The choice of technology to deal with emissions;
- The lack of satisfactory mitigation for the future residents of the strategic housing allocation;
- West Sussex should not become a net importer of waste;
- While the previous scheme was found to be acceptable, the current proposal is overdevelopment of the site; and
- The proposal is contrary to the Environment Bill 2020, which seeks to improve recycling and reduce the volume of residual waste incinerated.

AMENDED RECOMMENDATION:

The recommendation is 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, local settlements including the town of Arundel and 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;
- The proposed lighting scheme is considered to be inappropriate for a rural/suburban location; 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.

Notes: Changes to recommendations, conditions and / or reasons for refusal will always be reflected in the recommendation section of the attached Officer's Report.

Recommendation Report for County Matter Consultation

REF NO: F/15/20/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 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.

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 eastern half of the site and would feature one waste bunker, one combustion chamber, one turbine and one stack. It would also include education, administrative and welfare facilities. The WSTF would be located in the western half of the site. Other buildings and structures ancillary to the ERF and WSTF

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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 site 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 Mondays to Fridays and 60 HGVs to enter and exit the site 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 56 new permanent jobs and safeguarding 24 existing permanent jobs
- Treatment of a total of 295,000 tonnes of waste a year at the ERF and WSTF
- Power for around 68,000 homes
- £230m inward investment for the region
- Opportunity to provide heat and power for local homes
- Provision of apprenticeship, graduate recruitment and management training schemes
- Provision of educational outreach programmes.

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

SITE AREA

7.11 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

CHARACTER OF LOCALITY

hardstanding is situated in the south and east of the site.

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

For clarification:

F/19/13 - Planning permission (WSCC/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 (WSCC/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.

REPRESENTATIONS

This planning application is due to be discussed at a special meeting of the Ford, Yapton & Clymping Advisory Group on 25th August 2020.

COMMENTS ON REPRESENTATIONS RECEIVED:

The views of the Ford, Yapton & Clymping Advisory Group will be included in a subsequent update report.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

ENVIRONMENTAL HEALTH: No objection in principle to this application.

Noise - The noise report should take account of the fact that residential development is proposed on a large proportion of the site the subject of application F/4/20/OUT. Conditions are recommended to secure the use of only white sound reversing alarms on site and deliveries to the site during specified hours in both the construction and operational phases.

Lighting - The lighting scheme should be reviewed.

Air Quality - (i) Mitigation measures need to accord with the Air Quality and Emissions Mitigation Guidance for Sussex (2020). (ii) It is unclear how opportunities for improving cycle and pedestrian connections have been included in the design. (iii) Electric vehicle charge points should be included for staff parking and vehicles that are used on site should be electric where possible.

Odour - Not satisfied that the EIA has adequately evidenced that odours will not be a problem at sensitive receptors close by. Additional information has been requested.

Dust - A condition requiring the submission of dust management plans to cover both the demolition/construction phase and the operational phase is recommended.

Environmental Permitting - This is a matter for the Environment Agency.

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

ENVIRONMENTAL SERVICES & STRATEGY MANAGER:

The proposed development has no direct impact on the Council's role as a Waste Collection Authority. It appears that the rationale for the expansion is to meet the growing local commercial demand for waste disposal. This expansion may provide WSCC as the Waste Disposal Authority with additional local disposal options moving forward. It would appear that that there is a carbon footprint reduction benefit in the local treatment of waste, which would otherwise have to be transported further to alternative sites across the country. This can only be viewed as a positive.

CLEANSING OPERATIONS MANAGER:

The proposed development will not have an impact on the household waste collection service. The final destination of municipal waste is determined by West Sussex County Council as the waste disposal authority.

PARKS AND LANDSCAPES:

"The proposed energy recovery, waste sorting and transfer facility is 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 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.

A substantial landscape scheme should be integral to the development but the restricted size of the site does not allow the space required for a robust and effective scheme to be implemented.

ARBORICULTURIST:

The arboricultural submissions are comprehensive and the proposed development is achievable without detriment to existing on and off-site trees.

The illustrative layout does not provide confidence that the installations will be adequately screened from the surrounding future strategic development. The selection of native tree species of potential stature and longevity that will grow to enhance the local landscape is welcome, but far more undisturbed ground is required around them to ensure they can realise their potential. This can be said for the soft landscape proposals on all boundaries.

ENGINEERING SERVICES MANAGER: "Normal drainage requirements" expected.

ECONOMIC REGENERATION: "Economic Development has no comments".

PLANNING POLICY TEAM:

The site is identified in WSCC and SDNPA's Waste Local Plan 2014 (WLP) as a strategic waste allocation (Policy W10). Its development is guided by specific principles set out in paragraph 7.3.9 of the WLP.

The site is surrounded on all sides by a strategic housing allocation (SD8) in the Arun Local Plan 2011-2031. The housing allocation is currently the subject of an application for outline planning permission for 1500 dwellings (F/4/20/OUT). Therefore, a coordinated approach will be needed in relation to the following:

- Addressing the cumulative transport impacts (Policies T SP1, T DM1 & T SP3)
- Connecting walking and cycling routes (Policies T SP1 & QE DM3)
- Connecting the energy and heat with local users (NPPF Paras. 150 & 151)
- Avoiding or mitigating air pollution (Policy QE DM3)
- The impact on the landscape (Policy LAN DM1)
- Adapting to the effects of climate change (Policy ECC SP1)
- Proposals to upgrade the Ford Waste Water Treatment Works to facilitate growth
- Opportunities to enhance biodiversity (Policy ENV SP1)
- Recycling and recovery of materials on site (Policy WM DM1)
- The impact upon heritage assets (HER SP1).

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, whereas many of the other assets listed above are identified as of high significance.

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, which is significant".

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

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consultation with Arun District Council specifically requested the views of the Environmental Health Officer. The Environmental Health Officer's full comments have already been sent to West Sussex County Council.

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
QEDM3	QE DM3 Air Pollution
QEDM2	QE DM2 Light 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
 Quality of Design of commercial buildings
 Protection of existing businesses
 Sustainable Commercial Buildings
 Protection of trees and hedgerows
 Renewable Energy
 Surface water management
 Light Pollution

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
 Ford Neighbourhood Plan 2019 Policy EH8

PLANNING POLICY GUIDANCE:

NPPF National Planning Policy Framework
 NPPG National Planning Practice Guidance

SUPPLEMENTARY POLICY GUIDANCE:

SPD11 Arun Parking Standards 2020

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.

PRINCIPLE & KEY POLICIES

Apart from the access road and a small piece of land to the north west, 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 below.

Among the policies of the 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). It requires waste planning authorities to consider a list of factors, bearing in mind the type and scale of the envisaged waste management facility. These factors include:

- Protection of water quality and resources and flood risk management;
- Landscape and visual impacts;
- Nature conservation;
- Conserving the historic environment;
- Traffic and access;
- Air emissions including dust;
- Odours;
- Noise, light and vibration; and
- Potential land use conflict.

While ADC is not the waste planning authority, these headings would be appropriate to use in its response.

PROTECTION OF WATER RESOURCES AND FLOOD RISK

ADC's Engineering Services Manager has raised no objection to the proposed development. 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.

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 176.5m long and 134.2m wide (including roof overhang). The highest part of the roof would be 51.22m above ground level. An 85m high flue stack would be situated at the southern end of the building. 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 150.1m long and 64.5m wide (including roof overhang). The highest part of the roof would be 19.67m above ground level.

The landscape and visual effects of the proposed development are considered in Chapter 12 of the Environmental Statement and in paragraphs 105-119 of the Non-technical summary (NTS).

Paragraph 106 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 Down National Park boundary does lie 2.2 km to the north of the site and there are listed buildings, 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. While there are no public rights of way across the site, there are a number in the vicinity, with one adjacent to the northern boundary. There is no significant vegetation on the operational part of the site. Vegetation in the outlying area of the site to the north west will remain as existing. Vegetation outside the site, but located adjacent to the site boundary, is likely to be maintained."

Paragraph 110 notes that, within a 1.5km radius of the site, the proposals will be visible from some local housing areas, some public rights of way, local roads, some local workplaces and some views in the setting 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 111 argues that the building design "respects local character and includes strong references to the local heritage of the site, including the form of the main ERF building, which reflects the aeronautical history of Ford Airfield, an earthy colour palette for the cladding, use of traditional flint walling panels inspired by the local landscape, and features that reflect the alignment of the Arundel-Portsmouth canal".

Paragraph 112 states that new native structure planting along the boundaries of the site and new tree planting within the site will be substantially greater than the current vegetation on site and will assist with screening some of the ground level activities.

Paragraph 113 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 material will improve the overall character and distinctiveness of the site and that this will be beneficial.

Paragraph 114 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 115 acknowledges that the scale and height of the ERF building and stack 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. It states: "These effects mainly arise from the introduction of an uncharacteristic feature of industrial character into landscapes that are predominantly rural, or landscapes that currently have only limited and smaller scale industrial influences". The assessment of the significance of effects on the South Downs National Park concludes that the effects will be moderate to substantial.

Paragraph 117 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.

Paragraph 119 concludes: "Whilst the quality of the architectural appearance of the development is subjective, as a strong sculptural form in high quality materials that reflects its cultural context, it may be regarded as a positive, large scale landmark that can be accommodated in the expansive flat landscape and within the wider setting of the South Downs National Park." That view is not shared by ADC officers.

The proposed planting on the boundaries and within the site, described in paragraph NTS.112, is considered unlikely to provide effective screening. The Council's Leisure and Landscape Officer advised that a substantial landscape scheme should be an integral part of the development, but the restricted size of the site does not allow the space required for a robust and effective scheme to be implemented. The Council's Tree Officer made a similar comment that more ground would be needed to enable trees to realise their potential.

The proposed layout plan and the proposed masterplan for the site show the extent of built development that is proposed to be crammed onto the site with a negligible amount of space to provide soft landscaping and/or a buffer with the Strategic Housing Allocation. The site is considered to be too small to satisfactorily accommodate the scale of the proposed development.

The Design and Access Statement explains that the building design is made up of a number of key components. It states that a lower level 'plinth' relates to the scale of the hangars while the upper part of the building is described as "two dynamic and contrasting interlocking 'wings' which would celebrate the site's historical links with aviation". It argues that the latter assists in breaking up the size of the ERF.

The external materials would be a mixture of coated aluminium, steel and glazed cladding systems and some flint walling. The statement claims that "contrasting silver grey and coppery earthy colours are appropriate in blending the building with its surroundings". It adds that the design of the stack is played down in its form and colour, being left as a slender column to minimise its appearance against the sky.

The applicant acknowledges that due to the scale of the proposed building and the setting it would be impossible for it to be hidden. It would clearly remain a large feature within the landscape. It was therefore seen as an opportunity to create "a confident piece of architecture, a landmark within its setting".

However, officers are not convinced that the proposed building has been designed in the way best to mitigate its visual impact. The Design and Access statement says that a 'form follows function' approach was the starting principle for the building design. That is clearly evident in the submitted proposal which remains utilitarian in its appearance. More elegant forms of this type of building can be found elsewhere (e.g. Ardley, Cardiff and Leeds), one of which has embraced green living walls to mitigate its visual impact (Leeds). It is also noted that the proposed colours for the cladding are remarkably similar to an existing ERF building located in an industrial area in the City of Peterborough, where the surroundings are very different in character from those currently found at Ford.

NATURE CONSERVATION

WSCC has already consulted its own ecologist, who has raised no objection subject to measures to enhance the ecological value of the site being secured and detailed in a Landscape and Ecological

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Management Plan.**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. WSCC as local highway authority has examined the proposals and requested further information in respect of:

- A safety audit;
- Vehicle figures during phase 3 of the construction;
- The impact of the development on A259/Church Lane during the construction phase peak period and network peak;
- The impact of the development on the site access with the Ford Market proposals during the construction phase peak period and network peak; and
- The opportunities identified in the Walking, Cycling and Horse-Riding Assessment Report (WCHAR).

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). Peak HGV movements are forecast to be 120 each way (i.e. 240 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, there is uncertainty whether the size of some of the vehicles would need to increase in order to transport the higher quantity of waste that would be processed.

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, the operator is

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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.

The supporting statement explains that emissions from the flue 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 commented that (i) mitigation measures need to accord with the Air Quality and Emissions Mitigation Guidance for Sussex (2020), (ii) it is unclear how opportunities for improving cycle and pedestrian connections have been included in the design, and (iii) electric vehicle charge points should be included for staff parking and vehicles that are used on site should be electric where possible.

A condition requiring the submission of dust management plans to cover both the demolition / construction phase and the operational phase is recommended.

ODOURS

The Environmental Health Officer is not currently satisfied with the evidence that odours would not be a problem at sensitive receptors close by. It has been noted that the Environmental Statement states there are no receptors of high sensitivity within 200m of the development. However, there are houses proposed to be built on land adjacent to this site.

A planning condition is recommended requiring dust management plans for both the demolition / construction phase and the operational phase.

NOISE

It is noted that the majority of equipment with potential to create noise would be accommodated inside the main ERF and WSTF buildings. Two-metre high bunds with three-metre high acoustic fences at the site boundaries would also help to reduce noise. 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 considered the acoustic report and has drawn attention to the need for the report to consider residential properties over a large proportion of the site the subject of application F/4/20/OUT and has questioned why Ford Prison wasn't considered as a noise sensitive receptor. Conditions have been recommended permitting only the use of white sound reversing alarms on the site and a restriction on delivery times to the site, both for the demolition/construction phase and also during the operational phase.

While Chapter 14 of the Environmental Statement considers the possible noise effects should the proposed development the subject of application F/4/20/OUT be granted, an assessment has not been provided for the wider strategic allocation. The document states: "No development proposals exist for this area at the time of writing and therefore a robust assessment cannot be provided."

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 Design and Access Statement (Section 5.8) states that lighting has been designed in accordance with the environmental lighting zone E3/E4 (suburban/urban). The Environmental Health Officer disagrees and considers E2/E3 (rural/suburban) more appropriate and that the lighting should be reconsidered accordingly. Given the location and the requirement of Policy QE DM2 to minimise light pollution, the Environmental Health Officer's view is supported.

POTENTIAL LAND USE CONFLICT

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

A further impact arising from the scale and height of the proposed buildings is overshadowing. Page 35 of the design and access statement shows clearly the length of shadows that the building would cast over adjoining land. Some of this land comprises part of the Strategic Housing Allocation and has the potential to be blighted by the proposed development.

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 would encourage discussions between the applicant 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 will treat non-recyclable waste which would otherwise have gone to landfill or to treatment facilities further afield, which is not sustainable long-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 stack 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 the building 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 is inadequate.

There are some outstanding concerns in relation to noise, air quality, odour and lighting. 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:

For the reasons set out above, it is recommended that an OBJECTION be raised to the proposal.

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.

RECOMMENDATION

OBJECTION