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Your Ref: WSCC/036/20.

Our Ref: F/15/20/WS

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Please ask for:
Raymond Cole
Strategic Development Team
Direct Line: 01903 737598

Dear Mr Sierakowski

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

Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works.

Thank you for consulting Arun District Council on the above application for planning permission. I can inform you that this Authority strongly **objects**.

Officers and Members of the Council's Development Control 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, 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.

To expand on this, Members of the Development Control Committee were firmly of the view that the proposal would be detrimental to the local planning authority's ability to deliver housing at the strategic allocations detailed in the adopted Arun Local Plan both in terms of the quantum of housing and the Arun Strategic Transport Assessment. 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.

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)

Having regard to the impacts on environmental quality, the submitted environmental statement is considered to be flawed. The landscape and visual impact assessment underestimates the effects of the proposed development not only on the physical features of the landscape, but also on people's experience of the landscape. The electricity generated by the proposed development is proposed to be exported to the national grid, requiring a connection to be made with a sub-station a significant distance to the north west. The infrastructure required for that connection has not been included in the current application, nor any assessment made of its environmental impact, which is likely to be significant if it

took the form of an overhead line. It is implausible that the presence of a waste management facility of the scale proposed would not have an impact on people's choice of where to live or on the delivery of new housing and schools. Background noise levels have been measured at unrepresentative locations, in many cases where road traffic noise is high, leading to biased results. It is considered likely that there will be a significant rise in night-time noise levels for many of the local residents. The choice of technology for the cleaning of flue gasses is considered to be questionable and no commitment is given to update the technology on a regular basis to minimise pollution which would otherwise have an impact on the health of local residents. There is concern over the height of the stack. The proposed lighting scheme has also not been designed to reflect the rural/suburban location of the site and to minimise light pollution.

The District Council is not convinced that there is a need for a facility of the proposed size in this location to enable West Sussex to achieve net self-sufficiency in waste management. Instead, it is considered that the proposed development would lead to waste being transported to Arun from other parts of the south east region, over greater distances on inadequate roads. The proposal would have significant adverse environmental effects that are likely to preclude the development of adjoining land designated a strategic housing allocation in the Arun Local Plan 2011-31.

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.

If you wish to discuss the contents of this letter, or if there is anything you do not understand, please contact me.

Yours sincerely



Neil Crowther
Group Head of Planning

Planning
Arun District Council