



Foresters Lodge, 46 Lime Avenue, Westergate, Chichester, PO20 3UF

Telephone: [REDACTED]

Email address: [REDACTED]

11th December 2013

Our reference: 0095

By email and post

Mr James Neave

Planner, Communities & Infrastructure

West Sussex County Council

Strategic Planning Business Unit

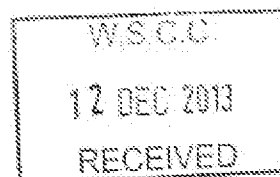
2nd Floor

Northleigh

County Hall

Chichester

PO19 1RH



Dear Mr Neave

RE: Planning Application WSCC/096/13/F Grundon Waste Plant at Ford

Ford Parish Council objects to the above Application based upon the points made in this letter.

1. This Plan is for up to 250,000 tons of waste to be imported by road into the area. This is in addition to the 100,000 tons agreed at the Viridor site. Add to this other waste sites that are currently operating at Ford. The narrow roads and lanes are incapable of safely dealing with additional traffic. Examination of the highway already shows extensive roadside damage to the verges, boundaries and embankments. Road surfaces are badly damaged from the weight of vehicles. They are historic, narrow roads not designed or built to carry such heavy loads and volumes of traffic.
2. The building of an incinerator is widely reported to have major health implications. It will affect the lives of a wide area of residents in West Sussex. Have all the people in the pollution risk areas been made aware of these plans? The elected representatives of those people should be advised of the risks to their areas. It is simply not good enough to build such polluting establishments without making the population at risk aware.
3. West Sussex has the ability to regulate the emissions of any such waste incinerator system and should insist on the Best Available Technology emissions control systems. This should mean the best available technology anywhere in the World. It is well understood that stack emissions currently subject to regulation in the UK exclude many compounds, and the emissions permitted from stationary sources dramatically exceed, on a g per volume basis, those from mobile sources. The local planning authority has

the moral duty to apply the precautionary principle and assume that these two unknowns: that the unquantified emissions may be harmful to health and that any organisation responsible must demonstrate and commit to long term provision of sufficiently advanced emissions control systems to reduce emissions to levels equivalent, or better, than those from the best mobile sources. While the jury is still out on the magnitude and specificity of health impacts from municipal waste incinerators, West Sussex County Council has a duty of care to its residents and must prioritise this over any company's need and desire to make a profit when deciding any planning decision.

4. The Council refers you to the following link (of which there are many) in support of the health risks. [\[REDACTED\]](#)
5. The Council believes that any planning consent or contract should prohibit the incineration of waste not originating within the boundaries of the planning authority area where the proposed plant is to be located. This is to minimise CO2 and exhaust emissions associated with transporting the waste, and ensuring that if the facility's long-term financial viability is predicated on importing, potentially at great environmental cost, waste from outside West Sussex, it is not permitted to be built in the first place.
6. Air pollution associated with low birthweight - Health News ... - Behind the headlines www.nhs.uk/.../Air-pollution-associated-with-low-birth-weight.aspx

The Council refers you to the WSCC Waste Consultation document:-

7. **Policy W18: Transport**
 - i) The application makes no use of rail or water for the transportation of materials to and from the site.
 - ii) Transport links are inadequate to serve the development and no adequate improvements to make routes safer or to an appropriate standard are included in the application.
 - iii) The number of H.G.V. movements presents an unacceptable impact on amenity, character and the environment with a massive increase in HGV emissions. The emissions performances of the trucks of the site owner and any subcontractors are not specified, but should be mandated at least to Euro 5/V specification. No attempt is made to minimise the impact of road transport on local communities and rural areas. The supposed environmental credentials of the facility are at odds with the location of the site: re-routing of traffic is necessary, but this then requires many more road miles east emitting CO2 and other pollutants. Facilities such as these should be sited immediately adjacent to major highways and in close proximity to the source of the waste.

- iv) Materials are not capable of being transported using solely the Lorry Route Network. Even if a similar routeing agreement was in place as with Viridor only part of the lorry route can be used. Vehicles are not permitted to travel South from the A27. All vehicles would have to use the A259.
- v) Extensive use of local roads by HGV's cannot be justified.
- vi) Vehicle movements cannot be minimised by the optimal use of a vehicle fleet. Deliveries will be made by many independent waste depositors not allowing any form of local control.
- vii) Development will have an adverse impact on the safety of all road users;
- viii) Vehicle movements for the waste delivery and removal will have a major adverse impact on the capacity of the highway network.
- ix) It was suggested at a public meeting that the applicants have no right to maintain their proposed entrance and exit to the site. This needs to be confirmed.
- x) There is not safe and adequate means of access to the highway network from the site as the access/exit route travels along a public footpath for a considerable length.
- xi) The number of HGV's has a negative impact on the quality of life of nearby residents and footpath users.
- xii) The entrance to the sites does not appear to be within the (1.86 miles) corridor either side of the LRN.
- xiii) The waste management plan makes it clear that Rollaston Park and the footpath at the rear of Rodney Crescent should not be used. The application ignores this.

8. Ford is a rural Location

- i) The plan states, 'although small sites adjoining the villages may be acceptable' 250,000 tones is not small 6.4.7 Refers. In addition they intend to use two hangers for additional waste recovery that have been excluded from the application.

Proposals for new built waste management facilities within or close to the South Downs National Park and the Areas of Outstanding Natural Beauty will also be judged against the criteria in Policy W13. Two fifty metre chimneys at this location breach these guide lines.

- ii) Landscape and Townscape Character

5.3.8 In meeting the need for the management of waste, the landscape and townscape character of West Sussex will be maintained and, where possible, enhanced. The character, distinctiveness and sense of place of the main natural character areas in the County – the South Coast Plain, the South Downs, the

Wealden Fringe/Wealden Greensand, the Low Weald, and the High Weald - will be reinforced and reflected in new development.

There has been no effort to protect or enhance the landscape and character of Ford or West Sussex. The views south from Arundel, north from Clymping, east from Yapton and West from Lyminster and Littlehampton will be ruined by the chimneys.

9. Flood Risk

- i) The entrance to the rear of Rodney Crescent is in a flood risk area. Rollaston Park floods at two places, first on the road owned by Strattons and the second place is the entrance to the Industrial Estate. Both these flood right across the road, the water can take days/weeks to go after a lot of rain.

10. Public Health

Large housing estate along Rollaston Park, many housing right on the road. Houses judder now when large vehicle go past. This will affect the residents their health/wellbeing, noise and smell.

- i) Local Business and child safety - If this waste site goes ahead they will be taking business away from an establish business (such as the Flying Fortress) as Grundons want to have access via their car park. This brings potentially lethal safety hazards to the children and parents/guardians exiting cars to use the children's play facility. This also brings a loss of 60 car parking spaces. This will ultimately amount to lost revenue for a thriving local business.
- ii) The local Farmer uses Rollaston Park on a regular basis to gain access to the fields, again they use the entrance that Grundons wish to use. Tractors and combines are everywhere at harvest time, this is noisy and dusty enough for residents who live on the road along Rollaston Park.

11. Policy W10: Strategic Waste Site Allocations

- i) Development principles for Built Waste Management Facilities 7.3.7 Site north of Wastewater Treatment Works, Ford development of the site to be comprehensive;
- ii) The European Commission states that "incineration shall mean thermal treatment of waste in an incineration plant as defined in Article 3(4) or a co-incineration plant as defined in Article 3(5) of Directive 2000/76/EC of the European Parliament and of the Council of 4 December 2000 on the incineration of waste. 'Incineration plant' means any stationary or mobile technical unit and equipment dedicated to the thermal treatment of wastes with or without recovery of the combustion heat generated. This includes the incineration by oxidation of waste as well as other thermal treatment processes such as pyrolysis, gasification or

plasma processes in so far as the substances resulting from the treatment are subsequently incinerated. This definition covers the site and the entire incineration plant including all incineration lines, waste reception, storage, on site pre-treatment facilities, waste-fuel and air-supply systems, boiler, facilities for the treatment of exhaust gases, on-site facilities for treatment or storage of residues and waste water, stack, devices and systems for controlling incineration operations, recording and monitoring incineration conditions.

Non-compliance. Plans show use of existing hangers built in the 1950's and exclude them from the application as they fail to meet the standard above. The buildings have a certificate of lawfulness granted by ADC. There is no restriction on numbers of HGVs or routes relating to the use of those buildings. As such, approving the planning consent de facto rubber-stamps permission for unlimited vehicle movements at any time of day.

- iii) Comprehensive landscaping scheme required; Non-compliance. Application fails to show.
- iv) assessment of impact on the listed buildings to the north and possible mitigation required; Unsatisfactory
- v) assessment of impacts on the amenity of users of public rights of way and possible mitigation and enhancement required;

Non-compliance. Entrance road is too narrow to split between HGV's and pedestrian users. It appears they do not own the land shown as a new footpath.

- vi) assessment of impact (e.g. traffic, noise, odour) on the amenity of dwellings to the north east and south west and possible mitigation required; Non-compliance None or unsatisfactory mitigations effecting 'life quality' of local residents.
- vii) the cumulative impacts of traffic, noise and odour on the environment and local communities to be satisfactorily addressed and mitigated as required, taking into account all existing, permitted, allocated, or proposed development within the wider area;

Non-compliance. Life quality of residents worsened 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; Non-compliance. Refused to comply with waste management plan.

- viii) Yapton and other westwards parishes need to be aware of this. pushing traffic down ford road to the A259 just means it will look for other short-cuts (i.e back through Yapton and over the railway towards Walberton) assessment of impact of additional HGV movements on highway capacity and road safety, including at the Church Lane and A259 junction and possible mitigation require a routing agreement is required 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. Non-compliance with waste management policy. They plans show these roads will be used.

12. Policy W12: High Quality Development

- i) Proposals for waste development will be permitted provided that they are of high quality and, where appropriate, the scale, form, and design (including landscaping) take into account the need to: integrate with and, where possible, enhance adjoining land-uses and minimise potential conflicts between land-uses and activities.
- ii) The topography, landscape, townscape, streetscape and skyline of the surrounding area; views into and out of the site; and the use of materials and building styles;

Non-compliance. Plans fail to meet the above.

13. Policy W16: Air, Soil, and Water

- i) Proposals for waste development will be permitted provided that:
 - (a) there are no unacceptable impacts on the intrinsic quality of, and where appropriate the quantity of, air, soil, and water resources (including ground, surface, transitional, and coastal waters);

Noncompliance - fails to give air pollution figures or other outputs from incinerator.

14. Policy W19: Public Health and Amenity

- i) Proposals for waste development will be permitted provided that:
 - (a) lighting, noise, dust, odours and other emissions, including those arising from traffic, are controlled to the extent that there will not be an unacceptable impact on public health and amenity;
Non-compliance. Plans do not show any mitigation of these extensive nuisances for the local resident. Traffic noise on Ford Road and in Rollaston Park is likely to increase dramatically.
 - (b) the routes and amenities of public rights of way are safeguarded, or where temporary or permanent re-routeing can be justified, replacement routes of comparable or enhanced amenity value are provided; Non-compliance. Plans fail to meet above
 - (c) where necessary, a site liaison group is established by the operator to address issues arising from the operation of a major waste West Sussex Waste Local Plan; Submission (Regulation 22) March 2013

Non-compliance. Plans fail to meet above.

15. Policy W21: Cumulative Impact

- i) Proposals for waste development, including the intensification of use, will be permitted provided that an unreasonable level of disturbance to the environment and/or local communities will not result from waste management and other sites operating simultaneously and/or successively. Phasing agreements may be sought to co-ordinate working, thereby reducing the cumulative impact.

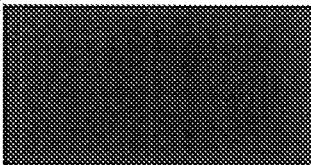
Non-compliance. Plans fail to meet above.

In addition to these points the Council understands that this proposal would totally prevent the SHLAA site 71 housing development for 2025. This proposal also contradicts and prevents the wishes of Ford's parishioners documented within the current Neighbourhood Plan which the parishioners of Ford are working towards.

As part of the objection the Council offers the unapproved minutes from the Parish Council meeting on Friday 28th November 2013 and the petitions handed to the Parish Council during the same meeting by two members of the public.

The Council require these points to be raised and addressed during the consultation process. The Council recommends that the County Council rejects the planning proposal.

Yours sincerely



Mrs Lisa Wilcock
Clerk
Ford Parish Council

Cc Rt Hon Nick Gibb MP
County Councillor Mrs Joan Phillips
District Council Mr Stephen Haymes

Enc(s) with posted version.

Unapproved Minutes Extraordinary meeting of Ford Parish Council Minutes

29th November 2013 – at a meeting of the Parish Council held at Yapton & Ford Village Hall

Present: Councillors Mr Ford, Mr Merritt, Mrs Whelan Cllr. Mr Myerscough District Councillor Mr S Haymes, County Councillor Mrs Joan Phillips. There were 48 members of the public.

Associate Member: Mr M Gillam

Clerk: Mrs Lisa Wilcock

Apologies: Cllrs Mr Edwards, Miss Baird, Mr Gaskell.

PARISH COUNCIL MEETING

The meeting opened at 1900

Apologies for absence

0104/13 Cllr Mr Edwards, Miss Baird and Mr Gaskell were unavailable for the meeting.

Declarations of Interest

0105/13 Members are reminded to make any declarations of personal and/or prejudicial interests that they may have to items on the agenda.

0106/13 No declarations were made in connection with the one agenda item

Overview of planning application WSCC/096/F/13 Grundon

0107/13 The Chairman explained that the proposal to build a gasification unit on the former Tarmac site was received by the Parish Council last Friday 22nd November 2013. The Parish Council has until 12th December 2013 to respond. The Chairman explained that the two existing hangers on the site were given a Certificate of Lawfulness use by the District Council and therefore were able to receive waste once a permit from the Environment Agency was issued depending on it being approved. These hangers have no restriction on vehicle movements. The hangers are not part of the proposal being discussed at the meeting. Any vehicle movements discussed will not include the vehicle movements to and from the 2 hangers that already have approval for their use. The Chairman offered the letters he has from the MP's and the Chief Executive of Arun District Council for public inspection. The gasification unit which is the proposal is documented as having a vehicle movements of 60 per day and jobs for 60 people which was estimated as 47 car movements per day. The two chimneys are 50m high and 1.1 meters wide. The gasification plant deliveries would stop at 3pm on a Saturday. The gasification unit would burn 24 hours per day out of one chimney. The other chimney was there to take over when the other chimney was being cleaned. The type of waste being burnt was unknown. The Clerk showed the public the traffic accident surveys and the drawing of the hangers that were excluded. The right of way over Rollaston Park and Rodney Crescent was there when Tarmac had the site but they did not exercise their right to use it. Grundon are exercise their right to use Rollaston Park as the entrance and the road behind Rodney Crescent as the exit. A pavement along the road behind Rodney Crescent was proposed as it is a Public Footpath. The Chairman noted that the proposal was a departure from the West Sussex County Council Draft Plan.

Public Session

0108/13 County Councillor Joan Phillips noted to the public that the roads to and from the site were documented within the WSCC Waste Local Plan Index 8 in November 2013 as being unsuitable for HGV use and would have an unacceptable impact on the highway network.

0109/13 A member of the public asked about the impact the use of Rollaston Park and the road behind Rodney Crescent would have on the public with the odour and noise.

0110/13 A member of public said that the MP's do not respect their views.

0111/13 A member of the public asked about access to the site. The Chairman said this was not clear. The traffic accident survey showed the route coming from A27 Arundel and to access via Ford Road, along Clymping and then right at the Oystercatcher. The other report showed that access was to be made North of Yapton Road only. The member of public said that Arundel was the "holy grail" and that any access via Arundel will be strongly opposed by Arundel and traffic will be pushed through Walberton.

0112/13 A member of the public said that the train barrier at North End Road was being changed to a gated barrier, which means a longer wait to cross the railway and that there are future plans to build a bridge.

0113/13 A member of the public asked about the safety of children living on the Peregrines and in Rodney Crescent and how their lives would be impacted due to the large increase in traffic. The member of the public said that 60 vehicles per day was not accurate and that with the traffic to the hangers and the staff it was more likely to be 140 vehicles per day. The public agreed with this statement.

0114/13 A member of public asked the Council about the right of way over the piece of road in Rollaston Park that Arun District Council and WSCC refused to adopt. The Chairman confirmed that the Parish Council has made enquiries about this piece of land owned by Strattons but a right of way still allows them to drive over it.

0115/13 A resident of Rodney Crescent who had lived there for 27 years said that road behind their houses were concrete and noisy, no safety barrier, beeping, disruption, no rules in place as there was only a "gentleman's agreement" in place during the Tarmac era. Headaches and sleeplessness were reported regarding the fumes and the residents were turned away only years later for it to be verified. Pollution from the vehicles stirred pollutants into the atmosphere that stuck to their windows and were impossible to remove. The Southern Water plant was promised to the public as giving off no smell at all but the residents are constantly living with the smell from the site and it was felt that the smell and pollution from the plant would be as bad. The question of all houses devaluing due to living near a incinerator was also spoken about and the public showed agreement with this point.

0116/13 A member of the public asked about pollution and hazardous waste. The Chairman said that the proposal was to clear ash from the chimneys and to store the ash in siloes. This was noted as being non-hazardous on the proposal.

Vote

0117/13 The Chairman asked for a quick show of hands of who was in favour of the proposal. No hands were shown. One member of the public said that Grundon can "stick it up their *behind*".

Public Session continues

0118/13 Local business the Flying Fortress were present and said that their parking area would reduce by 50% due to the access rights. During busy periods such as half term and school holidays the park operates and timed session. So people with children would be exiting their facility every 1½ to 2 hours. This equates to 25 – 30 cars in and out of the facility at all times. The childrens safety is paramount and the proposal does not set out any provision for their safety as it will be compromised. It was felt that the intrusion of the lorries would affect the running of the business and the childrens 5 a side football which is in the store behind the Flying Fortress. It was also noted that A Plant and the metal works park their vehicles along Rollaston Park and have vehicles coming in and out every 3 to 4 minutes and some of these are articulated lorries. It is felt this is all a health and safety issue due to the likelihood of a gridlock situation. There was a high possibility of this extra traffic causing a fatal accident.

0119/13 It was noted that the traffic accident survey used in the proposal was not accurate or up to date and did not include recent fatalities.

0200/13 A member of the public noted that no pedestrian crossing was offered across Rollaston Park as part of the proposal. It was stated the neither Rollaston Park nor the road behind Rodney Crescent were wide enough to cope with any large vehicle movements.

0201/13 A member of the public asked about the lorries shedding loads and how this will be restricted and monitored as Viridor have issues with this. Also how to stop HGVs taking rural lanes as routes such as Ford Lane and Horsemere Green Lane.

0202/13 A member of the public complained that vehicles were already racing up and down Ford Road from Clymping towards Arundel at 60/70 mph and that neither road was capable or made for this sort of traffic speed and volume now let alone for more traffic to be added.

0203/13 A member of the public said that pollution from traffic should have been monitored before the area was loaded with traffic. This level should have been understood so that an upper limit was enforced. This would make it possible to prosecute when levels were breached. Levels are already too high due to traffic from Viridor and Southern Water.

0204/13 The Chairman said that he had trawled the internet and the Grundon site in the Isle of Wight had been shut down on more than one occasions by the Environment Agency.

0205/13 A member of public said that the exit by Rodney Crescent is unacceptable for use by HGV's. To exit the road they have to swing out over both lanes and cars are forced off the road. The children wait their for their school bus and this is unacceptable.

0206/13 A member of public said that West Sussex County Council have the power under Section 106 to enforce tighter controls which they can impose if they wished to do so.

0207/13 A member of public said that there had been movements on site that the two hangers roofs are being fixed. This has caused the public disruption both due to the vehicles and the noise of the works.

0208/13 It was noted by a member of public that so far only one letter of objection was received at WSCC and that only 2 letters of concern were received. The objection process as tricky on the WSCC website as there are set questions and it people need to be careful to ensure they show their objection.

Public and Parish Council Vote

Both District Councillor Mr S Haymes and County Councillor Mrs J Phillips abstained from the vote.

0209/13 The Chairman asked for a show of hands from the member of the public as to who wanted to support the proposal. No hands shown. The Chairman asked for a show of hands as to who wanted to object to the proposal. All hands shown. The Chairman declared that the vote was unanimously against proposal WSCC/096/F/13.

0210/13 The Chairman asked the Parish Council whether they support the proposal. No hands were shown. The Chairman asked the Parish Council whether they objected to the proposal. All hands shown. The Chairman declared that the vote was unanimously against proposal WSCC/096/13/F.

Ford Parish Council response

0211/13 The Council agreed to respond to the proposal and to object to it as vigorously as possible using all of the points raised.

0212/13 The Chairman asked that every member of the public write to WSCC to oppose this proposal to help fight against it being built. Details of who to do this is on the agenda provided at the meeting.

0213/13 A petition against the building of the proposed waste site with 52 signature was given to the Clerk and a further petition was promised. This will be passed to County Councillor Mrs Joan Phillips.

0213/13 The Chairman thanked the public for coming to the meeting and reminded them that all updates will be provided on the Ford Parish Council website.

Meeting closed at 8.00pm.

Next regular Parish Council meeting is 21st January 2014 at 7.30pm at Yapton and Ford Village Hall.

Signed..... Dated.....

**Petition to stop Grunden lorries passing through
Rollaston Park and residential houses in Ford**

Grunden Waste Management has applied to West Sussex County Council to develop the old Tarmac site. They are proposing to have a one way traffic system that would mean 60 lorries a day passing through Rollaston Park, the residential housing and not to mention using the car park of The Flying Fortress, a children's indoor adventure centre.

Name	Address	Post Code
JANE WINFIELD	11 Wilson Court, Ford	BN18 0NX
SUE EDWARDS	27 BEAGLE DR. FORD	BN18 0NY
~~XXXXXXXXXX~~	~~XXXXXXXXXX~~	~~BN18 0NY~~
SHARON WHELAN	26 Beagle Drive, Ford	BN18 0NY
JOHN CASSIDY	24 Beagle Drive Ford	BN18 0NY
Wendy Tully	" " "	BN18 0NY
Angie Brown	25 Beagle Drive, Ford	BN18 0NY
Lesley Sampson	23 Beagle drive Ford	BN18 0NY
MICHAEL DODD	6 LEWIS LANE, FORD	BN18 0TY
Michelle Brown	8 LEWIS LANE, FORD	BN18 0TY
Nicky Wilson	24, Lewis Lane Ford	BN18 0TY
Mr Little	5 Lewis Lane, Ford	BN18 0TY
Cheryl Dore	12 Beagle Drive Ford	BN18 0NY
David Ellis	2 Beagle Drive Ford	BN18 0NY
Hebe Carr	44 Johnson Way, Ford	BN18 0TS
Steven Carr	44 Johnson Way, Ford	BN18 0TS
Adam Carr	44 Johnson Way, Ford	BN18 0TS
Jan Massey	7 Beagle Drive, Ford	BN18 0NY
Mr & Mrs Fawcett	4 Beagle Drive Ford	BN18 0NY
Mr & Mrs Murrell	60 Johnson Way	BN18 0TS
Sam Aaron	Widewood Cottages, Rotherham Rd	BN18 0NE
Julaine Roberts	38 Cherry Ave, Yupton	BN18 0AB
John Brown	22 Beagle Drive	BN18 0NY
Mr Fildes	" " "	"
DEBORAH SKILTON	2 WILSON COURT FORD	BN18 0NX
JENN SMITH	19 BEAGLE DRIVE, FORD	BN18 0NY
Cheryl Lamm	26, Lewis Lane, Ford	BN18 0TY
Ian Rushmore	26 LEWIS LANE, FORD	BN18 0TY
Amanda Bent	17 BEAGLE DRIVE, FORD	BN18 0NY
G. Smart	1 Wills Close Ford	BN18 0NL
J. S. May	23 Wills Close Ford	BN18 0NL

9

Future Waste recycling facility in Ford West Sussex.

We the under signed being residents of Ford are strongly opposed to any future waste recycling facility be built or operated in our village boundary. This petition was gathered during November 2013.

Signature

Signature

Signature

[Redacted signature area]

[Redacted signature area]

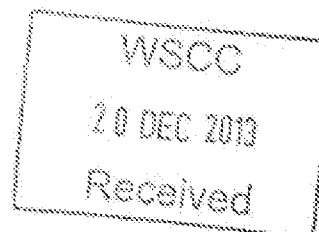
[Redacted signature area]

Planning Committee
Chairman
Andy Faulkner

6 The Poplars
Church Road
YAPTON
Arundel
BN18 0EQ

YAPTON PARISH COUNCIL

James Neave
Planning Officer
Strategic Planning Business Unit
West Sussex County Council
County Hall
CHICHESTER
PO19 1RH
17 December 2013



Dear Mr Neave,

Planning application WSCC/096/13/F Grondon Waste treatment facility at Ford

I am Chairman of Yapton Parish Council Planning Committee and in the absence of and on behalf of our Clerk, David Tansley, wish to register an objection to the above planning application. I understand from your website that whilst the end date for the consultations is 19 December 2013 representations about this application must be made by 6 January 2014 and I have taken this to be correct.

Affect on Local road network

Ford Airfield has in the past few years seen more than its fair share of industrial development which does little to enhance the agricultural nature of the surrounding land.

The following businesses have become established within recent years :-

- 1) A wastewater treatment plant on the north side of the airfield
- 2) A Materials recycling facility on the south east side of the airfield
- 3) A Waste and recycling facility south of Yapton Road adjacent to Ford war memorial
- 4) A waste and recycling facility in the Rudford Industrial Estate
- 5) Several businesses served by large vehicles on the Rudford Industrial Estate

These have led to a significant increase in large vehicle and HGV movements on a rural road network not built for such traffic. There are road safety implications on the local road network which have not been given proper consideration when approving these facilities.

The above proposal will exacerbate problems which resident's of the Villages of Ford, Clymping, Yapton and Walberton experience currently and it is not acceptable to worsen the situation by bringing more traffic to the area. Experience shows that Routeing Agreements can be circumvented by sub-contracting haulage to an outside contractor. The emerging Yapton Neighbourhood Plan seeks to minimise the impact of commercial vehicle movements through the village.

The concentration of this number of waste sites in this small area of West Sussex has led to an unsustainable increase in vehicle movements on the B2132 and B2233 and Church Lane/Ford Road/Ford Lane. Comparison of vehicle movements when this site was operated by Tarmac Topblock are irrelevant due to the increase in vehicle movements mentioned above.

The inbound route quoted in the Transport assessment, Appendix 07.1 is not suited for regular movements of HGV's. The Junction on the A259 at the Oystercatcher is dangerous for vehicles of this size making right turns. No record of a recent fatality at this location on 25th August 2013 has been included in the collision data as it only shows information between May 2008 and the 31st May 2013. The first part of Yapton Road to Horsmere Green Lane has no pedestrian footways and because of the carriageway width on this section is also dangerous and intimidating for cyclists who make use of this road. The lack of a pedestrian footway continues past the Ford airfield entrance to Rollaston Park. Turning into Rollaston Park you pass a residential area and then go past the Flying Fortress family fun centre which will necessitate removal of car parking spaces for an important local business. This is a business which promotes healthy growth of children and it is important it continues to operate without any restriction to car parking facilities. This route is considered unsuitable for regular HGV movements.

For outward movements from the facility, the route through Yapton village centre and north up North End Road passing Yapton C of E School is totally unsuitable for further HGV movements. Ford Lane is also unsuited as an exit route because it also necessitates the use of Yapton railway level crossing. The crossing has become a dangerous pinchpoint for large and HGV movements seriously affecting the operation of the railway to the detriment of rail passengers. The Office of the Rail Regulator issued Network Rail with an improvement order and as a result the speed of trains has been reduced from 75mph to 30mph to mitigate level crossing misuse. Allowing a change of use to nurseries off Lake Lane has left the area with a serious problem and the Ford application must not be allowed to make this situation any worse.

Network Rail are presently reviewing the operation of the crossing to permanently minimise the risk of a serious collision between a train and road vehicles using the crossing and Lake Lane. Should the option of installing a fully gated crossing be chosen this will decrease significantly the time available for road vehicle movements over the crossing as presently occurs at Ford station railway crossing.

The use of Ford Road to access the A27Arundel is also not suitable due to resident parking at the northern end. Any routing agreement to and from the facility will have little possibility of enforcement especially if third party vehicles are used to convey materials.

Any movement of waste across the County or from adjacent Counties will increase CO2 emissions and pollution. This will have a negative effect on any savings attributed to the recycling operation. Recycling should take place close to the source of creation of the materials being treated.

Waste incinerator

We have serious concerns about the emissions from the two fifty metre chimneys into the surrounding atmosphere. We believe there is a serious health risk to the new housing being built at Courtwick, other areas of Littlehampton, and beyond as far as Worthing. We seek assurance that there will be no health risk to residents of these communities from Dioxin emissions. What safeguards are in place to prevent the emission of Dioxin. We would like to see base line figures established at various locations in the area and for these to be monitored if the application is approved.

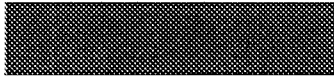
In conclusion

We consider that the health and welfare of local residents is more important than importing waste to generate additional revenue. This application exceeds waste facility provision in this small area and will lead to greater congestion of the local road network. We also have serious concerns about the increased safety risk to cyclists and pedestrians that additional vehicle movements will bring, particularly among the younger and older members of the community who are more vulnerable. Air quality in the area will be affected by increased vehicle emissions. We also consider that the emission of Dioxin fumes needs to be considered carefully as it could have serious repercussions to public health.

So far as this application is concerned we believe the 'Proximity Principle' should be applied in recognition of the fact that transporting waste has environmental, social and economic costs and should be dealt with as near to the place of production as possible. This will raise awareness about waste and encourage ownership of the problem at a local level. Therefore we would expect only waste originating within West Sussex be treated at the proposed facility.

Can you please acknowledge receipt of this response.

Yours sincerely,

A rectangular area of the document has been redacted with a solid black box, obscuring the signature of the Planning Committee Chairman.

**Planning Committee Chairman
Yapton Parish Council**

