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Date: 27 March 2020

Mr Raymond Cole
Arun District Council
Planning Department
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

Dear Mr Cole,

Application Ref.: F/4/20/OUT

Applicant: Redrow Homes Southern Counties and Wates Developments Ltd

Proposal: Outline planning application (with all matters reserved except for access) for the development of up to 1,500 dwellings (Use Class C3), 60-bed care home (Use Class C2), up to 9,000 sqm of employment floorspace (Use Classes B1), local centre of up to 2,350 sqm including up to 900 sqm retail/ commercial (Use Classes A1-A5) and 1,450 sqm community/ leisure floorspace (Use Classes D1-D2), land for a two-form entry primary school (Use Class D1), public open space, allotments, new sports pitches and associated facilities, drainage, parking and associated access, infrastructure, landscape, ancillary and site preparation works, including demolition of existing buildings and part removal of existing runway hardstanding.

Location: Land at Ford Airfield Ford

I refer to the above planning application by Redrow Homes Southern Counties and Wates Developments and should be grateful if you would take into account the representation detailed below.

Introduction

This representation has been prepared on behalf of Viridor Waste Management Limited, who currently operate the strategically important recycling facility at Ford. The site provides essential recycling services for West Sussex County Council under a 29 year contract. Viridor also forms one half of the Ford Energy from Waste Ltd joint venture developing plans for an energy recovery facility on the strategic waste site allocated at Ford, currently occupied and operated by Grondon Waste Management Ltd.

Reason for Representation

The purpose of having a planning system in place is to guide future development, while ensuring that the function and operation of existing land uses are protected. The planning system looks to balance environmental, economic and social priorities, all the while promoting sustainable economic growth.

With economic growth, i.e. the construction of new housing, infrastructure and increased business/industrial development, comes increased generation of waste.

By their very nature, as a result of the types of materials being handled and the operations which take place at waste management facilities, waste management operations have the potential to generate impacts beyond the site boundary. It is for this reason that waste management facilities are typically strategically located a reasonable distance from sensitive receptors, such as residential properties. Suitable sites are therefore very difficult to identify and those that are identified are strongly protected by national policy and local plan policy. The layout proposed in the planning application shown on both the Illustrative Masterplan and the Land Use & Density Parameter Plan (Drawing RG-M-123) is therefore of significant concern.

Paragraph 8 of National Planning Policy for Waste (NPPW) is clear on the protection that waste management sites should be afforded:

When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that: the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities.

Furthermore, the West Sussex Waste Local Plan builds in further protection:

Policy W2: Safeguarding Waste Management Sites and Infrastructure

Development that would prevent or prejudice the use of existing waste management sites or infrastructure that make an important contribution to the transfer of waste will not be permitted unless:

(a) the current use is temporary and the site or infrastructure is unsuitable for continued waste use;

(b) continued use of the site or infrastructure for waste management purposes would be unacceptable in terms of its impact on local communities and/or the environment;

(c) redevelopment of the site or loss of the infrastructure would form part of a strategy or scheme that has wider social and/or economic benefits that clearly outweigh the retention of the site or the infrastructure for waste use; or

(d) a suitable replacement site or infrastructure has been identified and permitted.

Further supported by Policy WM DM1 of the Arun District Local Plan:

Policy WM DM1

Waste Management

'....In accordance with the West Sussex Waste Local Plan, 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 Council will consult the

relevant Waste Planning Authority on development proposed at, adjacent or proximal to existing or allocated waste sites and infrastructure.

Despite the National, Strategic and Local planning policy position, the planning application for 'The Landings' provides very little evidence to demonstrate how the proposed residential and employment uses can be compatible with the existing and future strategic waste related operations that are; currently being carried out, that are permitted to be carried out and that could be carried out in the future.

The application therefore fails to provide the evidence and comfort that is required to allow permission to be issued. The applicant must demonstrate that its proposals incorporate sufficient mitigation measures to allow the current, permitted and future strategic waste uses in the area to continue to operate in a safe and efficient manner whilst ensuring that future residents and businesses do not suffer from any loss of amenity.

Paragraph 182 of NPPF is of particular relevance in this respect:

Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

Prior to the submission of this Outline Planning Application, we met with the developer to outline our concerns and it is clear from those discussions that there are opportunities to design mitigation measures into 'The Landings' scheme. These include but are not limited to hard and soft landscaping, acoustic fencing, a revised layout and the provision of a standoff/buffer zone. From a quick review of the Ford Strategic allocation, 'The Landings' only appears to take up a proportion of the allocated area so there is plenty of room to accommodate the housing numbers proposed in the application whilst delivering a scheme which doesn't prejudice the current, permitted and future strategic waste management activities.

National and local planning policy clearly requires the applicant to demonstrate its use doesn't prejudice the waste management operations and not the other way around. We simply cannot get into a position where complaints from future residents put either the construction or future operation of our facilities at risk. If the tables were turned and it was Viridor proposing a waste management in such close proximity to existing residential use, it is inevitable that there would be significant opposition to such a proposal.

It is important to note that we do not have any objection to the principle of housing or the employment uses on the Ford Strategic allocation. It is clear to us that an appropriately designed scheme can allow the strategic waste activities to prosper without detriment to future residents. However, it is equally clear that the current scheme has not been appropriately designed or appropriately assessed. We therefore have no option but to **object** to the Land Use & Density Parameter Plan (Drawing RG-M-123) and the proximity and density of the housing and employment uses promoted by the developer.

We strongly encourage both Arun DC and the developer to work with all adjoining waste management operators to develop a scheme that works for all parties.

Until then we urge Arun DC not to grant permission for the scheme until:

- The housing layout is reconfigured to provide an optimum distance between sensitive receptors and waste management sites taking into account, noise, odour and air quality and based on realistic assumptions for current, permitted and potential waste activities. As a working assumption the starting position should be a minimum buffer of 250m (consistent with West Sussex County Council's Minerals and Waste Safeguarding Guidance, adopted October 2019).
- Adequate mitigation measures (supported by technical assessments) are built into the scheme to ensure that the risk of complaint is minimised, and the amenity of residents is not compromised.

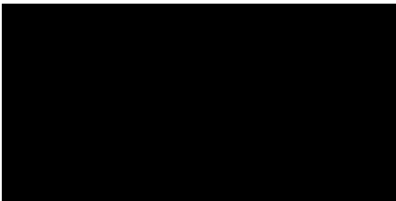
The objection detailed above currently concerns the principle of building housing in such close proximity to the waste management sites and hence it would be completely unacceptable to leave this critical detail to be addressed at reserved matters stage. We are currently reviewing the Environmental Statement and may add to this representation in due course.

As indicated above, I am happy to attend any meeting with you and the developer to discuss the issues in more detail.

I should be grateful if you would confirm receipt of this response and keep me informed of any developments related to this application.

I look forward to hearing from you.

Yours sincerely,



Ian John
Director of Planning & Permitting



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