

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

27th March 2020

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 Ford Energy from Waste Ltd. Ford Energy from Waste Ltd is a joint venture company owned by Viridor Waste Management Ltd and Grundon Waste Management Ltd, both significant waste management operators in the UK. Ford Energy from Waste Ltd is currently developing plans for an energy recovery facility on the strategic waste site allocated at Ford, currently occupied and operated by Grundon Waste Management Ltd. It is the intention to submit a planning application accompanied by an Environmental Statement to West Sussex County Council for determination in May this year.

Reason for Representation

West Sussex's Waste Local Plan was adopted in April 2014 and allocates the Grundon owned site at Ford as a **strategic waste site** at Ford through Policy W10. The Waste Local Plan seeks to protect this allocation through policy W2:

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.*

And this protection is reinforced 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.'

In January 2015 West Sussex County Council granted planning permission (WSCC/096/13/F) for a significant development on the allocated site in the form of a Circular Technology Park that amongst other matters included an energy from waste plant. This planning permission has been implemented. Despite the local planning policy position and the 2015 permission detailed above, the planning application for 'The Landings' does not appear to take into account:

- National, strategic and local plan policy concerning the protection of waste infrastructure
- the strategic importance of the allocated site to West Sussex,
- the 2015 planning permission for the Circular Technology Park,
- the impacts of the significant construction phase associated with the build of permitted or future uses at the Circular Technology Park,
- the operational impacts of permitted or future uses at the Circular Technology Park
- alternative potential future Strategic Waste Uses and their potential impacts in terms of construction and operation.

Therefore, insufficient evidence has been provided to demonstrate how the proposed residential and employment uses can be compatible with the existing and future 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. Planning permission should not therefore be issued.

By their very nature, as a result of the types of waste materials being handled and the 24/7 nature of the operations which take place at energy from waste facilities, they 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 and offices. Suitable sites are therefore very difficult to identify and those that are identified are strongly protected by national and local planning 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.

The applicant must demonstrate that their proposals incorporate sufficient mitigation measures to allow the permitted and future strategic waste management uses at Ford CTP to operate in a safe and efficient manner whilst ensuring that future receptors 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.

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.

Representatives from Ford EfW Limited met with the developer and their advisors in February 2020 to outline any immediate concerns and it was clear from those discussions that there are numerous 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 appropriate standoff/buffer zones. From an initial review of the Ford Strategic allocation, 'The Landings' only appears to take up a proportion of the allocated area so it is considered that there is sufficient land available within the applicants control to accommodate the housing numbers and employment space proposed in the application whilst delivering a scheme which doesn't prejudice the safe and efficient construction and operation of either permitted or future strategic waste management activities at Ford CTP.

National and local planning policy very clearly requires the applicant to demonstrate its use doesn't prejudice the strategic waste management operations and not the other way around. To get into a position where complaints from future receptors could put the construction and operation of either the permitted or future strategic waste management facilities at risk would mean that disregard has been had to both national and local planning policy which is in place not only to protect sites of strategic importance but also to meet the identified needs of their area for the management of waste streams.

It is important to note that we do not have any objection to the principle of housing or employment use on the Ford Strategic allocation. It is clear to us that an appropriately designed scheme can allow waste activities within the area to prosper without detriment to future receptors. However, it is equally

clear that the current scheme has not been appropriately assessed or designed. 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 would strongly encourage both Arun DC and the developer to work with all adjoining waste management operators to develop a scheme that works for everyone. In fact there may be some synergistic benefits from developing plans together.

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

- The proposed 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 technical assumptions. As a working assumption the starting position should be a minimum buffer of 250m.
- 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 receptors is not compromised.

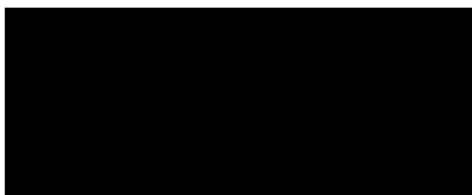
Given the potential impact of 'The Landings' scheme on the ability to operate any waste management facility on the allocated site, any temptation to leave this detail to be addressed at reserved matters stage should be resisted.

As indicated above, we are 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,



Paul McLaughlin MRTPI MCIWM

**Project Manager
Ford Energy from Waste Limited**