

W SCC CONSULTATION RESPONSE:
County Planning – Minerals & Waste Planning Authority

TO:	Arun District Council Case Officer: Raymond Cole
DATE:	25 June 2020
LOCATION:	Ford Airfield, Ford
SUBJECT:	F/4/20/OUT: 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.
RECOMMENDATION:	☐ Advice ☒ Objection ☐ Modification ☐ No Objection ☒ More Information ☐ Refusal

These comments follow the submission of a Waste Infrastructure Statement (dated May 2020) prepared by the applicant. They should be read in conjunction with comments made on 2 April 2020.

Submitted Waste Infrastructure Statement

Policies W2 and W10 of the West Sussex Waste Local Plan (WLP) 2014 control development that would prevent or prejudice the use of existing and allocated waste management sites. The submitted Statement seeks to demonstrate how the proposal can be delivered without preventing or prejudicing the operation of existing waste facilities. It includes consideration of the relevant safeguarded waste management facilities as previously highlighted by this authority, and seeks to respond to the requirements of W SCC Safeguarding Guidance.

It highlights the close proximity of the application site to these facilities, and limited separation distances from residential properties. However, it fails to identify the proximity of the proposed employment area, which shares a boundary with the New Circular Technology Park (CTP - extant permission W SCC/096/13/F for a major waste treatment facility), and a strategic waste allocation site in the WLP (Policy W10). Potential interactions and impacts upon proposed employment uses should be considered.

Some screening surrounding existing waste management facilities is identified; however, it is limited in scope. Further, the Statement offers little consideration of the how such screening would address or mitigate any impacts arising from proximity to the proposed development.

In terms of identifying pre-existing conditions resulting from neighbouring waste uses (e.g. background noise, light, odours, dust), the Statement suggest no concerns are raised to date for some facilities. Regardless of whether operators of these facilities have made comments to date, as a minimum, a qualitative assessment of potential impacts and any resultant mitigation required should be provided for all facilities. Baseline assessments should consider impacts such as HGV movements, visual, noise, odour, dust and air quality, where appropriate with reference to assessments carried out as part of relevant applications for the above waste management facilities included, and updated to take account of changes in baseline conditions and proximity to sensitive receptors now proposed.

The Statement largely relies on assessments that only consider impacts arising from existing operations (e.g. noise). This may be appropriate in some cases (albeit the scope and appropriateness of such surveys must be verified by Environmental Health Officers – for which, it is understood, no comments have been made to date). However, it fails to robustly take into account the potential impact on, and of, current and future waste management sites, in particular that of the adjacent CTP site, which is allocated in the WLP, and has extant permission for a substantially larger facility than is currently the case.

Of further concern is the reliance on existing controls imposed on waste management facilities, and the assumption that new residents would be more tolerant of pre-existing conditions. Although existing facilities are subject to planning permission and/or environmental permits that seek to control potential impacts upon neighbouring amenity/ environment (e.g. noise and odour), such controls are primarily based on proximity to sensitive receptors at the time of their consideration (e.g. Condition 28 of WSCC/096/13/F, relating to noise, assumed sensitive receptors at a greater distance than that now proposed).

It is important to ensure that the proposed development would be both compatible with existing waste uses, and not prejudice their ongoing or future development (in accordance with Policies W2 and W10 of the WLP). Introducing new residential/community/employment development in close proximity to existing and future potential waste operations is such that there is cause for concern for this authority. Any assessment must therefore take into account the potential impact of both the approved and emerging use of this strategic waste site, and other waste sites in the vicinity, on the proposed development, to ensure that, as an ‘agent of change’, suitable mitigation is included before the development is completed (paragraph 182 of the NPPF).

Information on proposed mitigation measures remains generic and limited. Although noise and odour mitigation recommendations are muted (e.g. through potential provision of buffer zones, acoustic barriers/bunds, and gardens and residential properties oriented in such a way that habitable rooms dwellings do not face industrial buildings), there is little detail on these measures, and they are only described in respect of some number of the neighbouring waste facilities.

Appropriate buffers and mitigation should be built into the proposed development (informed by a thorough assessment of potential interactions with neighbouring waste



uses), with suitable separation distances provided between sensitive uses and the waste sites, to ensure that the proposed development would be both compatible with existing waste uses, and not prejudice their ongoing or future development. Such measures should be discussed with Environmental Health Officers and operators of neighbouring waste facilities to ensure that development could coexist without unacceptable conflict. All mitigation relied upon to demonstrate existing waste uses and their future development would not be compromised, and demonstration of their feasibility, must be clearly detailed, and as a minimum, their extent and outline detail easily identifiable on the proposed Masterplan.

The proximity of proposed uses to the CTP including housing, the proposed 'local centre' to the west/north west, and the proposed employment uses immediately adjacent to the east remain of key concern. Given that this site is allocated as a strategic waste site, and planning permission has been granted (and part implemented) for an energy recovery facility, future operations are likely to have a greater impact than is currently the case.

Further, a planning application for the development of a major Waste Sorting and Treatment Facility (WSTF) and Energy Recovery Facility (ERF) on the Strategic Waste Allocation site has recently been received by WSCC. Although this application is awaiting validation (expected shortly), it is recommended that both the applicant and determining authority reviews the development proposals therein, and supporting assessments, with a view to ensuring the interactions between the proposals are given full consideration.

The decision maker also should be satisfied that the proposals minimise waste generation, maximise opportunities for re-using and recycling waste, and where necessary include waste management facilities of an appropriate type and scale (Policy W23).

Conclusion

Existing and allocated waste management facilities/sites must be protected from inappropriate neighbouring development that could prejudice their efficient operation and future development. The layout of the development proposed could result in sensitive uses (e.g. housing, residential care home, schools, community hub, recreation and public spaces) being in closer proximity to waste sites than is currently the case, and without appropriate assessment of potential impacts or identification of appropriate mitigation, particularly the Circular Technology Park.

Based on the information provided to date, including the submitted Waste Infrastructure Statement, the applicant has not demonstrated that the development would not prevent or prejudice the use of the existing or allocated waste management sites. Therefore, WSCC continues to **object** to the proposed development as it would be contrary to policies W2 and W10 of the WLP.

West Sussex Joint Minerals Local Plan (July 2018)

The site is not within areas identified as Mineral Safeguarding Areas within the West Sussex Joint Minerals Local Plan.

James Neave, Principal Planner

