

WSCC CONSULTATION RESPONSE:

County Planning – Minerals & Waste Planning Authority

TO:	Arun District Council Case Officer: Raymond Cole
DATE:	11 March 2021
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 revised Waste Infrastructure Statement (dated February 2021). They should be read in conjunction with WSCC comments made on 2 April 2020 and 25 June 2020, as well as comments made on the Ford Master Plan in January 2021.

Revised Waste Infrastructure Statement (WIS)

The revised WIS is a significant improvement on previous iterations, including assessment of the relevant nearby safeguarded waste management facilities, consideration of their planning permissions, and providing greater detail of the potential mitigation measures proposed to ensure compatibility with existing waste facilities. This is welcomed.

The latest Land Use & Density Parameter Plan (Rev K), shows a significantly increased buffer between the nearest proposed residential areas and the existing/allocated waste site at the New Circular Technology Park (aided by the placement of additional playing fields, which should be a less sensitive receptor compared to residential properties). This is also welcomed.

The more detailed assessment in relation to Wickes Farm, Northwood Farm, and South Coast Skips is noted. Provided that Environmental Health Officers are satisfied with the associated technical reviews, the County Planning Authority does not consider the

proposals would be likely to prejudice the use of these waste facilities. These sites are thus not considered any further below.

The application site surrounds the WSCC Waste Local Plan (2014) (WLP) Strategic Waste Allocation 'Site north of Wastewater Treatment Works, Ford'. Contrary to the assertions of the WIS that only existing or consented (extant) schemes need to be considered, WLP Policy W10 (d) is clear that the site is safeguarded from any development that would prevent or prejudice its development (in whole or part) for allocated waste management uses. This strategic site has yet to be developed in full as an EfW facility (in accordance with WSCC/096/13), which excludes large areas of the allocation site (Hangars), and where future waste uses are still promoted. Further, the land is the subject of a current planning application for the development of a major Waste Sorting and Treatment Facility (WSTF) and Energy Recovery Facility (ERF) - Ref: WSCC/036/20.

The LPA must give due consideration to both existing and potential future waste development proposals and potential interactions with the proposed development, to ensure any future use of the allocated site would not be unduly prejudiced.

The WIS mistakenly suggests, that as subject to an Environmental Permit, any odour arising from the extant waste management facilities at the New Circular Technology Park must be contained/reduced such as to ensure that it would not cause odour impacts outside the site. Whilst it is understood it must be assumed that the Environmental Permitting regime will operate effectively, it is important to note that; (1) the current EA permit relates only to the operation of a Waste Transfer Facility (not the full extant permission for a combined MRF/EfW of considerably greater throughput, and for which future Permit requirements cannot be assumed); (2) an Environmental Permit seeks to ensure that Best Available Techniques are adopted to minimise impacts (and thus residual impacts may still arise); (3) the Environmental Permit was granted on the basis of the existing context of the site (i.e. where sensitive receptors are considerably further away than the current proposals); (4) the site remains an allocated site, where potentially other odour generating proposals could come forward.

Nonetheless, given the distances involved to the nearest proposed sensitive residential receptors, and odour mitigation measures required/possible for waste management uses of the site, provided that Environmental Health Officers are satisfied, it is not considered that potential for odour from the existing/allocated site would be preventative to the proposed residential development. Environmental Health Officers should also be satisfied that other sensitive receptors to odour proposed (including office spaces, playing fields) in the vicinity of waste facilities are acceptable.

With specific reference to the Ford Waste Water Treatment Works (WWTW), it is understood that Southern Water have raised a number of concerns regarding the applicants odour assessments, assumed odour contours, and thus proposed layouts. The applicant will need to address these concerns, in consultation with Environmental Health Officers, to robustly demonstrate that sensitive receptors would not be placed in areas which may be likely to result in odour impacts, such as to prejudice both the current and future expansion of the existing WWTW.

In terms of the noise relationship with HD White Metal Recycling (WSCC/012/12/F), the WIS seemingly concludes that, with attenuation and mitigation, a rating level of 10dB and 4dB above background can be expected at the proposed residential development and care home respectively. It considers that the context of the site is such that receptors would be more tolerant of industrial noise, and that noise reductions from outside to inside would result in recommended daytime levels in habitable rooms. However, Condition 7 of

WSSC/012/12/F requires that the noise rating level from the waste facility at the nearest sensitive residential premises does not exceed 5dB above background. On that basis, the applicant's own assessment shows this pre-existing condition (and thus the existing waste use) would not be operable. Accordingly, the proposed development would prejudice the use of the existing waste management site contrary to WLP Policy W2.

Similarly, in terms of the noise relationship with the extant, part implemented, Grundon waste facility (WSSC/096/13/F), the WIS concludes that several residential premises would experience noise levels in the order of 35-39dBA. Condition 28 of WSSC/096/13/F requires that the noise the rating level from the waste facility at the boundary of the nearest sensitive residential premises (not habitable rooms) does not exceed 35dBA at any time. It is unclear if the this calculated rating level includes consideration or any mitigation proposed, which should also be clarified. The applicant's own assessment shows that this pre-existing condition (and thus the existing waste use) would not be operable. Accordingly, the proposed development would prejudice the use of the existing waste management site contrary to WLP Policy W2.

The County Planning Authority requires it be demonstrated that the proposed development would not place sensitive receptors in areas where operational conditions attached to extant waste uses would be inoperable and/or would likely lead to complaints. This must be achieved through the provision of appropriate buffers or attenuation/mitigation, the effectiveness of which must be demonstrated.

Notwithstanding the above, Section 4 of the WIS includes outline proposals for noise mitigation, which confirm likely need for specific noise mitigation measures to ensure compatibility with three existing waste management facilities, those being; the part implemented Grundon Waste Management Facility at the New Circular Technology Park; HD White Metal Recycling at Ford Industrial Estate; and Viridor's Material Recycling Facility (MRF) at Ford Airfield. In summary, the outline measures include a requirement for a 3m high acoustic barrier around the Ford Industrial Estate, and for areas highlighted in Figure 3 that gardens and habitable rooms be orientated to avoid facing the waste facilities. The applicant proposes that such measures could be secured by condition.

Whilst the proposed mitigation is welcomed, the extent of sensitive receptors that need to be subject to such requirements is cause for concern. Although indicative illustrations seek to demonstrate how such orientations could be achieved, given the extent of areas affected, and types of development proposed (e.g. care homes, primary school, high density residential areas), concerns are raised as to the practicality of such orientations being achievable without significant impact on the layout and deliverability of the scheme. The LPA will need to be satisfied in this regard.

Considering the above, it is also questionable whether the applicant's proposed condition would be sufficiently precise (particularly if mitigation were to be delivered in phases), and/or appropriate. Further, for the avoidance of doubt, the County Planning Authority would wish for any outline masterplan (and/or and Land Use Plans) to be based on required buffers and to detail both specific noise mitigation features (e.g. barriers) and highlight any areas requiring controlled orientation for noise mitigation.

In terms of landscape/visual matters, given the proximity of the allocated application site to existing and allocated waste sites, there will inevitably some visual relationship and mutual views, which the LPA and applicant should be fully aware of. It is important that any proposed landscaping, boundary treatment and buffers seeks to maximise its screening effect, and aid in the integration of lands uses (whilst utilising appropriate native species). Accordingly, buffer planting as highlighted in the submitted Green and Blue



Infrastructure Parameter Plan (Rev M) and Masterplan (Rev W) must be secured and if possible increased. Consistency between the plans should be ensured (it is noted that proposed planting to north of WWTW and the New Circular Technology Park are not consistent across the plans). The County Planning Authority would wish for landscape buffers to be maximised, particularly where they could soften views of existing and future waste management facilities and/or complement their boundary treatments.

The LPA will need to take into account any comments of WSCC as Highway Authority with regard to highway safety and capacity and be satisfied that the applicant has demonstrated any uplift in vehicular movements resulting from the development takes into those arising from existing and extant waste management facilities.

The applicant is advised to directly consult the operators of the waste management sites identified above to establish any further key areas of concern.

Conclusion

The Arun District Local Plan 2011-2031 (ADLP) and Ford Parish Council Neighbourhood Development Plan 2017-2021 allocation of the application site to provide housing, community and commercial development is fully acknowledged. The County Planning Authority fully recognise the importance of, and in principle policy support for the development.

However, as required by Policies W2 and W10 of the WLP, Policies WM DM1 and QE SP1 and Policy H SP2c (SD8) of the ADLP, and Policy EE3 of the Ford Neighbourhood Plan, any development of the site must ensure that existing and allocated waste management facilities/sites must be safeguarded from inappropriate neighbouring development that could prejudice their operation and/or future development, and ensure new development is safeguarded from the impacts of incompatible land uses.

The applicant has made positive steps in addressing waste safeguarding matters, however, has not demonstrated that the proposed development, in particular the proximity of sensitive uses to existing and allocated waste management sites, could be delivered without prejudicing the operation of existing waste management facilities. The mitigation identified to date, does not demonstrate 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.

James Neave, Principal Planner

