



Viridor House, Priory Bridge Rd, Taunton TA1 1AP
T: 01823 721400 www.viridor.co.uk

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/5/20/PL

Applicant: Ford Airfield Market

Proposal: Reconfiguration of Ford Market, including revised market access, hardstanding for replacement vehicular parking and associated infrastructure, landscape, ancillary and site preparation works.

Location: Ford Airfield Market Ford BN18 0FL

I refer to the above planning application by Ford Airfield Market 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 Grundon Waste Management Ltd.

Reason for Representation

Whilst the application indicates that it is not proposing to intensify the overall use of the market, it proposes one single point of access to the east off Ford Road and hence that access will see an increase in intensity, diverting all traffic visiting the market onto Ford Road and the existing service road ('Hunterford'). This will naturally have the effect of significantly increasing vehicular traffic at the junction of 'Hunterford' with Ford Road.

It is therefore concerning that the Transport Assessment submitted as part of the application does not appear to take into account all of the permitted vehicle movements associated with that access. The Assessment needs to take into account all existing and potential vehicle movements including

the movements associated with both Viridor's MRF and Grundon Waste Management's recent permission to increase the number of lorry movements associated with its Circular Technology Park. As it stands it appears that the Assessment falls short and therefore the application has not properly considered the planning baseline and the potential cumulative impacts.

We also have serious concerns over the revised layout, and in particular the proposal for the new overflow car park and the new pedestrian crossings. This would create a new access point and two new pedestrian crossings, with all of the associated issues in terms of safety and conflicts between vehicles visiting both Viridor and Grundon's sites and the users of the market. The vehicles visiting the waste management sites are heavy goods vehicles, and therefore, there is a clear and unacceptable conflict between the vehicles visiting the waste management sites and pedestrians crossing the roads from the overflow car park to access the rest of the market. The safe and efficient operation these strategic waste management uses will be compromised as a result and we have therefore no option other than to **object** to this application.

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 planning policy position detailed above, the planning application does not provide any evidence to demonstrate how the new the arrangements will 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 current, permitted and future strategic waste uses in the area must be allowed to continue to operate in a safe and efficient manner.

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. Until then we would urge Arun DC not to grant permission.

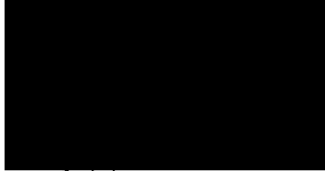
It is also strange that this application has been submitted separately to the Outline Application (F/4/20/OUT) for the housing and mixed-use development surrounding Ford Airfield when the two appear to be so inherently linked. I would therefore recommend that your Authority take legal advice to ensure that it is comfortable that the EIA Regulations are being adhered to in this respect.

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,

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Ian John
Director of Planning & Permitting

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