

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

27<sup>th</sup> March 2020

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 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** through Policy W10. The Waste Local Plan seeks to protect this allocation through policy W2:

A joint-venture partnership between



*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.

A subsequent planning permission (WSCC/027/18/F) also allowed for a new access road to the Ford CTP site off Ford Road, with a significant increased number of HGV movements associated with the strategic waste management site.

We note that the plans included in the planning application for the Ford Airfield Market reconfiguration do not show the Ford CTP new site access road.

Whilst we recognize that the planning application for the Ford Airfield Market reconfiguration does not seek to intensify the overall use of the market, it proposes one single point of access to the east off Ford Road, diverting all traffic visiting the market onto Ford Road and the existing service road (Hunterford), which also leads to the Materials Recycling Facility operated by Viridor Waste Management, Waste Water Treatment Works operated by Southern Water and Ford Circular Technology Park operated by Grundon Waste Management. This will of course lead to a significant increase in vehicle traffic at the junction of 'Hunterford' with Ford Road.

In this instance, the Transport Assessment submitted as part of the planning application for Ford Airfield Market reconfiguration does not take account of the recently permitted increase in HGV movements at Ford CTP. It is also unclear if the Transport Assessment takes into account existing vehicle movements from the three strategic waste facilities outlined above.

We are also extremely concerned with the proposed layout for the market reconfiguration, and in particular the proposal for the new overflow car park. This would create a new access point along the Hunterford service road and a new pedestrian crossing in very close proximity to the access point to the Ford CTP site, with the associated issues of pedestrian safety and conflicts between vehicles entering the three strategic waste facilities outlined above and the users of the market.

Representatives from Ford EfW Limited met with advisors to this planning application in February 2020 to outline immediate concerns and it was clear from those discussions that there were alternative access arrangements to the overflow car park under consideration however it is unclear from the plans and documents submitted that alternative access arrangements have been identified and assessed.

The intensification to the junction of 'Hunterford' with Ford Road and the potential conflict with market traffic and pedestrians at the entrance to Ford CTP will inevitably harm the safe and efficient operation of permitted and future strategic waste management uses at Ford CTP.

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:

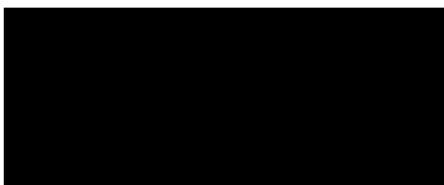
- The proposed layout is reconfigured to provide an appropriate means of access to the overflow car park and main car park which takes into account existing traffic flows, vehicle types and visibility splays from existing strategic waste management facilities.
- A revised Transport Assessment is submitted which considers the correct baseline and potential cumulative impacts with other strategic waste management facilities.

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**

