
Ford Airfield Market

Waste Infrastructure Statement

On behalf of Ford Airfield Market

May 2020

Ford Airfield Market
Waste Infrastructure Statement

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APPENDICES

1.0 GRUNDON PERMIT	
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1.0 INTRODUCTION

1.1. This Waste Infrastructure Statement has been prepared on behalf of Ford Airfield Market further to the submission of planning application F/5/20/PL for development at Ford Airfield Market in Ford, West Sussex.

1.2. The description of development is as follows:

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

1.3. This Statement is submitted in accordance with Policy W2 'Safeguarding Waste Management Sites and Infrastructure' of the West Sussex Waste Local Plan (April 2014) and the associated Mineral and Waste Safeguarding Guidance (October 2019).

1.4. It demonstrates how the proposals can be successfully delivered without preventing or prejudicing the operations of existing waste facilities.

2.0 BACKGROUND

2.1. The West Sussex Mineral and Waste Safeguarding Guidance explains that Waste Consultation Areas exist around all safeguarded Waste Infrastructure. Appendix E of the Guidance provides the Consultation Area Maps by Local Authority Area, including Arun District.

2.2. The application site falls within multiple Waste Infrastructure Consultation Areas. West Sussex County Council (WSCC) has confirmed that these relate to the following waste facilities, which should be considered in this Statement:

- 1) H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site, operated by H D White.
- 2) New Circular Technology Park, Ford – Materials Recycling Facility, operated by Grundon Waste Management Ltd.
- 3) Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment Facility, operated by Southern Water.
- 4) South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility, operated by South Coast Skips Ltd.
- 5) Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility, operated by Viridor.

2.3. Paragraph 3.3. of the Guidance document explains that:

"The need for the proposed development will be weighed against the need to retain the minerals and/or safeguarded site and the relevant criteria in Policy M10 of the JMLP and Policy W2 of the WLP. For proximate development, consideration will be given to whether it can proceed without compromising the ability of the site to operate effectively or whether mitigation would reduce the sensitivity of the development to an acceptable level, in accordance with the 'agent of change' principle."

2.4. Information that allows the Waste Planning Authority and Local Planning Authority to make this assessment should be provided and should address matters including:

- *"The distance of the proposal from the safeguarded site;*
- *Any existing screening from buildings or vegetation;*

- *Identification of pre-existing conditions such as background noise, light, odours, vibration, dust and other emissions;*
- *The potential for the site to deliver suitable mitigation including the identification of the means by which the development has introduced layout, design and other mitigation measures to mitigate potential effect on and from the safeguarded site;*
- *Confirmation of pre-application consultation/engagement with the minerals or waste infrastructure operator (to demonstrate a full understanding of the existing and potential future operation of the site, including hours of operation, level of activity and likely sources of noise, light, odours, vibration, dust and other emissions);*
- *Where appropriate, a full assessment of issues such as noise and light;*
- *Statement of the overall compatibility of the development with the minerals or waste infrastructure."*

2.5. Paragraph 3.8. of the Guidance document goes on to explain that:

"Applicants are strongly advised to undertake pre-application discussions with the MPA/WPA where the development site is on, or within close proximity, to safeguarded infrastructure (within the MCA or WCA). It may also be appropriate to engage with the site operator to gain a better understanding of the particular amenity issues associated with the site. Pre-application discussions and advice should include:

- *whether the proposal would prejudice the operation of the safeguarded site;*
- *whether any mitigation measures would enable the development to go ahead without compromising the site;*
- *the need to provide replacement capacity, if considered necessary.*

The advice received should be reflected in the information submitted with the application."

2.6. The remainder of this Statement responds to each of the requirements of the Guidance document in turn with reference to each safeguarded site.

- 2.7. In the first instance, it is important to note that Ford Airfield is allocated for development via Policy H SP2c (part SD8) of the Arun District Local Plan 2011-2031, which was formally adopted by ADC in July 2018. The site is also allocated via Policy SA1 of the made Ford Parish Council Neighbourhood Development Plan 2017-2031 (January 2019).
- 2.8. The site is allocated in both Plans for a residential-led mixed-use development involving up to 1,500 new homes, employment, a community hub comprising retail / commercial and community uses, primary school, nursery and associated development.
- 2.9. These allocations clearly establish the 'in principle' acceptability of residential-led mixed-use development at the site. The allocations were made in full knowledge and understanding of the existing safeguarded sites and were consulted upon widely.
- 2.10. The proposals at Ford Airfield Market are necessary to facilitate the delivery of the allocated site.

3.0 CONFORMITY WITH WASTE FACILITIES

The distance of the proposal from the safeguarded site

3.1. Ford Airfield Market has operated at Ford Airfield for a number of years alongside the safeguarded site. It is an existing use that will largely continue to operate in the same location. The Market proposals ensure that it has the same trading and visitor capacity as its current operation.

3.2. The proposals involve a minor reconfiguration to the way in which the Market will operate, principally through the removal of the western runway, which is currently used for car parking, and the provision of a replacement overflow car park, alongside revised access.

1) *H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site*
Operated by H D White

3.3. Based on the submitted Proposed Site Plan, the southern part of the northern runway (the closest part of the proposals to the safeguarded site) is circa 256m from the safeguarded site.

2) *New Circular Technology Park, Ford – Materials Recycling Facility*
Operated by Grundon Waste Management Ltd

3.4. Based on the submitted Proposed Site Plan, the proposed overflow car park (the closest part of the proposals to the safeguarded site) is circa 24m from the safeguarded site.

3) *Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment Facility*
Operated by Southern Water

3.5. Based on the submitted Proposed Site Plan, the proposed overflow car park (the closest part of the proposals to the safeguarded site) is circa 17m from the safeguarded site.

4) *South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility*
Operated by South Coast Skips Ltd

- 3.6. Based on the submitted Proposed Site Plan, the southern runway (the closest part of the proposals to the safeguarded site) is circa 233m from the safeguarded site.

*5) Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility
Operated by Viridor*

- 3.7. Based on the submitted Proposed Site Plan, the southern runway (the closest part of the proposals to the safeguarded site) is circa 14m from the safeguarded site.

Any existing screening from buildings or vegetation

*1) H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site
Operated by H D White*

- 3.8. The safeguarded site benefits from some existing screening from vegetation around its eastern boundary.

*2) New Circular Technology Park, Ford – Materials Recycling Facility
Operated by Grundon Waste Management Ltd*

- 3.9. The safeguarded site benefits from some existing screening from vegetation around its northern, eastern and western boundaries.

*3) Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment Facility
Operated by Southern Water*

- 3.10. The safeguarded site benefits from existing screening from vegetation around its perimeter.

*4) South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility
Operated by South Coast Skips Ltd*

- 3.11. The safeguarded site benefits from some existing screening from vegetation around its eastern boundary.

5) *Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility
Operated by Viridor*

- 3.12. The safeguarded site benefits from extensive existing screening from vegetation around its perimeter.

Identification of pre-existing conditions such as background noise, light, odours, vibration, dust and other emissions

1) *H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site
Operated by H D White*

- 3.13. We are aware of operational noise associated with processes and vehicles entering / leaving the industrial estate.

2) *New Circular Technology Park, Ford – Materials Recycling Facility
Operated by Grundon Waste Management Ltd*

- 3.14. Based on conversations with local residents during a public exhibition held in January 2020 ahead of submission of the Outline planning application, we understand that locals have experienced significant odour on an ongoing basis from the existing Grundon facility.

- 3.15. It is understood that odour arises from the doors to the facility being left open during operations, resulting in odour not being contained, while waste is often discarded outside the buildings, attracting seagulls and rats in the process. This conflicts with the requirements set out within Grundon's permit, as provided at Appendix 1, which explains at paragraph 3.2.1 that:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable, to minimise, the odour."

- 3.16. We understand that Grundon does not have an odour or environmental management plan in place at present.

- 3.17. Noise emissions at the safeguarded site are subject to planning conditions, including limits on the hours of use for intensive operations. We are, however, aware from conversations with local residents during the public exhibition of concerns regarding noise from the facility. With this in mind, it is necessary to have regard to the additional requirements set out within Grundon's permit, with paragraph 3.3.1 explaining that:

"Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable, to minimise, the noise and vibration."

- 3.18. It is necessary for strict monitoring of compliance with the terms of Grundon's permit and planning conditions, particularly regarding odour and noise, to ensure an acceptable relationship with existing and proposed neighbouring uses.

*3) Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment Facility
Operated by Southern Water*

- 3.19. We are aware that the safeguarded site releases odour due to the nature of the material handled on site. We understand that the level of odour varies depending on the time of day, meteorological conditions, wind speed / direction and maintenance / operational factors.

*4) South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility
Operated by South Coast Skips Ltd*

- 3.20. Unknown – not raised as a potential concern to date.

*5) Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility
Operated by Viridor*

- 3.21. We are aware of operational noise associated with the emptying of glass and materials, vehicle horns, reversing alarms and noise from plant and processing. The facility does not handle odorous materials.

The potential for the site to deliver suitable mitigation including the identification of the means by which the development has introduced layout, design and other mitigation measures to mitigate potential effect on and from the safeguarded site

- 1) *H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site
Operated by H D White*
- 2) *New Circular Technology Park, Ford – Materials Recycling Facility
Operated by Grundon Waste Management Ltd*
- 3) *Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment Facility
Operated by Southern Water*
- 4) *South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility
Operated by South Coast Skips Ltd*
- 5) *Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility
Operated by Viridor*

- 3.22. As explained above, the Market has operated at Ford Airfield for a number of years alongside the safeguarded site. It is an existing use that will largely continue to operate in the same location. The Market proposals ensure that it has the same trading and visitor capacity as its current operation. Given the nature of the proposals, it is not considered that the safeguarded site would be adversely affected, and mitigation is therefore not required.

Confirmation of pre-application consultation/engagement with the minerals or waste infrastructure operator (to demonstrate a full understanding of the existing and potential future operation of the site, including hours of operation, level of activity and likely sources of noise, light, odours, vibration, dust and other emissions)

- 1) *H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site
Operated by H D White*

3) *Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment Facility*
Operated by Southern Water

4) *South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility*
Operated by South Coast Skips Ltd

5) *Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility*
Operated by Viridor

3.23. As part of the pre-application process, engagement has taken place with a range of local stakeholders. Invitations to engagement and consultation events have been sent to every resident and business within Ford parish, alongside others likely to be affected by the proposals. The operators of the safeguarded site have not raised any concerns regarding the proposals.

2) *New Circular Technology Park, Ford – Materials Recycling Facility*
Operated by Grundon Waste Management Ltd

3.24. As part of the pre-application process, engagement has taken place with Grundon, the current operator of the safeguarded site. A full review of the planning permissions at the site, alongside the respective planning conditions and permit, has taken place.

3.25. Further to this, we are aware that an EIA Scoping Report has been submitted by Ford EfW Ltd – a joint venture between Grundon Waste Management Limited and Viridor – to West Sussex County Council (WSCC) in connection with their proposals for the development of an Energy Recovery Facility (ERF) and Waste Transfer Station (WTS) at the safeguarded site. We have also met with Grundon and Viridor to discuss our respective proposals.

3.26. The Market proposals ensure that it has the same trading and visitor capacity as its current operation. Given the nature of the proposals, it is not considered that the existing or proposed waste uses would be adversely affected.

Where appropriate, a full assessment of issues such as noise and light

1) *H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site*
Operated by H D White

- 2) *New Circular Technology Park, Ford – Materials Recycling Facility
Operated by Grundon Waste Management Ltd*
- 3) *Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water
Treatment Facility
Operated by Southern Water*
- 4) *South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and
Aggregate Recycling Facility
Operated by South Coast Skips Ltd*
- 5) *Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility
Operated by Viridor*

3.27. It is not considered that an assessment of noise or light issues is necessary. Market operations will continue as existing and no lighting is proposed through the application.

***Statement of the overall compatibility of the development with the minerals
or waste infrastructure***

- 1) *H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site
Operated by H D White*
- 2) *New Circular Technology Park, Ford – Materials Recycling Facility
Operated by Grundon Waste Management Ltd*
- 3) *Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water
Treatment Facility
Operated by Southern Water*
- 4) *South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and
Aggregate Recycling Facility
Operated by South Coast Skips Ltd*
- 5) *Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility
Operated by Viridor*

- 3.28. Overall, as demonstrated throughout this Statement, the proposed development can proceed without compromising the ability of the safeguarded site to operate effectively. The proposed development is entirely compatible with the safeguarded site.

4.0 CONCLUSION

- 4.1. As explained above, the proposed development is considered to be entirely compatible with all existing waste facilities, in line with the adopted Arun District Local Plan, Ford Neighbourhood Plan and West Sussex Waste Local Plan.
- 4.2. Full details and justification are provided in the submitted Planning, Design and Access Statement.