



WSCC CONSULTATION RESPONSE:
County Planning – Minerals & Waste Planning Authority

TO:	Arun District Council Case Officer: Raymond Cole						
DATE:	25 June 2020						
LOCATION:	Ford Airfield Market, Ford						
SUBJECT:	F/5/20/PL - Reconfiguration of Ford Market, including revised market access, hardstanding for replacement vehicular parking and associated infrastructure, landscape, ancillary and site preparation works.						
RECOMMENDATION:	<table><tr><td>☐ Advice</td><td>☒ Objection</td></tr><tr><td>☐ Modification</td><td>☐ No Objection</td></tr><tr><td>☒ More Information</td><td>☐ Refusal</td></tr></table>	☐ Advice	☒ Objection	☐ Modification	☐ No Objection	☒ More Information	☐ Refusal
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☐ 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 WSCC Safeguarding Guidance.

Although the Statement does identify the various existing waste facilities in the locality that could interact with the proposed development, it fails to robustly take into account the potential impacts or compatibility with current and future waste management sites. Accordingly, concerns raised by this authority dated 2 April 2020, have not been addressed.

It is accepted the established use of runway areas for the market already coexists alongside existing waste uses, which provides important context to the proposals, and should inform the scope of the Waste Infrastructure Statement. However, as previously noted, the proposals would result in an increase in both vehicular and pedestrian traffic on both the highway network and service roads to the east, which are shared with existing waste management facilities, and an allocated strategic waste site. It also includes the provision of a new overflow car park and pedestrian facilities that could also impact upon, or be affected by, existing waste management facilities.

Further, a planning application for the development of a 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.

To reiterate key concerns as previously highlighted;

The LPA will need to take into account any comments of WSCC as Highway Authority with regard to highway safety and capacity; however, in waste facility safeguarding terms, it will be essential that the applicant demonstrates that any potential changes to access arrangements would not prevent or prejudice the use of the existing or allocated waste management sites. This should include consideration of the potential for conflict between market traffic and that of waste management sites, and ensure that no obstruction of access to these facilities would occur (particularly during peak market hours).

With particular regard to the Circular Technology Park (CTP), this site is allocated as a strategic waste site, and planning permission has been granted, and part implemented, for an energy recovery facility. As a result, the baseline position for any assessments must recognise and accurately reflect the realistic fall back position for the site, which will have a greater impact than the facility currently in operation, in particular with regard to the permitted volume of vehicular movements, and potential for conflict with any development sited in close proximity (e.g. visual, noise, odour, dust and air quality).

It is of note the submitted plans do not detail the existing access (and associated landscaping/drainage) to the CTP site, which is both implemented and in use. Submitted assessments do not take into account relevant EIA assessments provided in support of developments at the CTP site, or neighbouring waste sites, or controls attached to permissions thereto (e.g. routing, hours and volumes of HGV movements).

Consideration should be given to providing further mitigation (e.g. comprehensive screening planting/bunds) and any removal of trees/vegetation should be avoided or carefully considered to ensure that it would not open up wider views to existing and future waste management sites. All mitigation relied upon to demonstrate existing waste uses and their future development would not be compromised, must be clearly detailed.

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

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 development proposed could impact upon the operation of three major waste management facilities, in particular by virtue of potential conflict or obstruction to their access. The submission fails to consider extant permitted development (e.g. the recently completed and now sole access to the CTP site), compatibility therewith, or provide details of any mitigation required to ensure their efficient operation



Based on the information provided to date, 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

