

**WSCC CONSULTATION RESPONSE:
County Planning – Minerals & Waste Planning Authority (MWPA)**

TO:	Arun District Council Case Officer: Raymond Cole
DATE:	16 April 2021
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:	☒ Advice ☐ Objection ☐ Modification ☐ No Objection ☐ More Information ☐ Refusal

These comments follow the submission of a revised Waste Infrastructure Statement (WIS) (dated February 2021) prepared by the applicant. They should be read in conjunction with comments made on 2 April and 25 June 2020.

Submitted Waste Infrastructure Statement (WIS)

The WIS continues to suggest the proposals would result in no change to the existing relationship of the market with surrounding safeguarded waste sites.

Whilst it is accepted the established market use already coexists alongside existing waste uses, and will remain largely unchanged, the proposals would result in an increase in both vehicular and pedestrian traffic on the highway network and service roads to the east which are shared with existing waste management facilities (and an allocated strategic waste site). They also include the provision of a new overflow car park and pedestrian facilities adjacent to the WWTW and Circular Technology Park (CTP) which could result in increased conflict in terms of potential visual, noise, and odour impacts.

Nonetheless, the WIS has been updated to include a 'Highways Technical Note' which seeks to demonstrate that potential changes to the market access arrangements and parking would not hamper existing waste site traffic, or cumulatively result in unacceptable impacts with safeguarded waste management sites that share the eastern access to/from Ford Road and Church Lane.

The Technical Note confirms that traffic associated with all extant waste facilities (including the maximum permitted HGV movements under WSCC/096/13 & WSCC/027/18) has been taken into account in assessment of existing and future impacts on the highway network, and that a robust worst case scenario has been considered.

On that basis, and noting that WSCC as Highway Authority raise no objection in highway safety or capacity terms, whilst there may be potential for some cumulative effects of increased traffic on Ford Road/Church Lane, it is not considered such impacts are grounds for objection.



The Technical Note also considers the proposed reconfiguration of site access arrangements at the internal four-way junction serving several existing and allocated waste sites. It concludes that the proposed arrangements would ensure vehicles entering both the market area and overflow car park would be able to proceed immediately, and that priority arrangements would ensure any impediment to waste site traffic would be minimised.

Whilst the MWPA reserve concerns over the potential for some delays to waste site traffic on internal access roads, and note that Transport Assessment modelling suggests a maximum 80 second delay for vehicles exiting onto Ford Road (worst case during peak market times), provided WSCC as Highway Authority raise no further highway safety/capacity concerns, the MWPA do not consider any such impediment to waste site traffic would be considered sufficiently prejudicial such as to warrant objection.

However, to ensure any such impacts are minimised the MWPA would request that, in discussion with the Highway Authority, consideration be given to conditions to secure (1) vehicular layouts and circulation in accordance with the submitted plans, (2) carriageway demarcation as set out in Technical Note paragraph 2.2.4, and (3) a car-parking and pedestrian management strategy.

Regarding potential odour and noise impacts, the WIS mistakenly concludes that there would be no potential for increased impacts, or that existing Environmental Permits would require any noise or odour emissions from existing waste facilities do not give rise to nuisance. Whilst it must be assumed that the Environmental Permitting regime will operate effectively, it is important to note that; (1) current EA permits relate only to the operation of Waste Facilities as they stand now (e.g. not the full extent of extant permitted facilities); (2) an Environmental Permit seeks to ensure that Best Available Techniques are adopted to minimise impacts (and thus residual impacts may still arise); (3) Environmental Permits have been considered on the basis of the existing context of the sites; (4) the CTP site remains an allocated site, where potentially other odour generating proposals could come forward.

Nonetheless, although there may be some potential for noise/odour impacts to be experienced at the proposed overflow car park, it is considered a lower sensitivity use (than say compared with residential properties/amenity space). As such, provided Environmental Health Officers are satisfied with this relationship, it is not considered that potential odour/noise conflict with safeguarded waste facilities would be preventative to the proposed development.

In terms of visual/landscape impacts, the proximity of the proposed overflow car park to the safeguarded CTP site is such that the MWPA reserves some concern regarding the potential for increased visual impacts, in particular the effect of removing a significant section of Mature Poplar trees to the north of the service road, which currently afford valuable screening of the safeguarded CTP site. At present the proposals are for new tree planting alongside the eastern boundary of the overflow car park only.

Nonetheless, given existing boundary treatments, subject to conditions to ensure proposed landscaping is expanded to include boundary screen planting to the north and west (that complements that recently planted as part of WSCC/027/18), the MWPA is satisfied that the proposed development would not prejudice existing and future safeguarded waste sites.

It is of further note the submitted plans do not detail the existing CTP access (and associated landscaping/drainage), which is both implemented and in use. The LPA must



satisfy for themselves that the proposed development would not impact upon this scheme or associated drainage/landscaping.

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 is currently under consideration (WSCC/011/21). It is strongly 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.

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. Whilst the development proposed could impact upon the operation of three major safeguarded waste management sites which remains cause for some concern, subject to suitable conditions to ensure appropriate mitigation of any potential internal access conflict, and a comprehensive landscaping scheme, it is not considered that the proposed development is so prejudicial to safeguarded waste sites such as to warrant an objection.

Therefore, WSCC as MWPA offers **advice** to the LPA (as set out above) to ensure the development would be consistent with the requirements of policies W2 and W10 of the WLP.

West Sussex Joint Minerals Local Plan (July 2018 (Partial Review March 2021))

The site is not within areas identified as Mineral Safeguarding Areas within the West Sussex Joint Minerals Local Plan.

James Neave, Principal Planner

