



**WALBERTON PARISH COUNCIL
INCLUDING FONTWELL AND BINSTED**

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1st August 2020

WSSCC/036/20: Ford Energy Recovery Facility

Walberton Parish Council wishes to raise an **objection** to the above planning application.

Walberton Parish Council **strongly supports** the objection raised by Ford Parish Council concerning this application.

Our reasons for objecting are as follows.

Visual impact on the local area

- The site is within 400m of housing in Yapton
- Other existing houses in Ford are closer still (under 300m from the site)
- Walberton Parish's boundary is less than 2 miles from the site. The land between Walberton and the site is relatively flat and the elevations are very similar.
- The view from the South Downs National Park (SDNP), with the Downs at a higher elevation than Ford, will be considerably impacted by the proposed facility.
- Ford Parish Council's Neighbourhood Plan Policy SA1 represents a Ford Airfield development of 1500 houses which will be adjacent to the proposed site. This site is included in Arun District Council (ADC)'s Local Plan (policy SD8). We cannot believe that anyone would want to buy a house next to this proposed facility thereby potentially putting Arun's housing land supply in an even worse position than it currently is.
- We are at a loss to understand why proper photographic evidence of views has not been included. COVID-19 is not a valid excuse as obtaining images need not compromise current social distancing requirements: they can even be obtained through use of drones handled by skilled licensed operators.

An 85m Chimney Stack – just 2 houses shorter than the chimneys at Battersea Power Station - and a 45m tall building will have a significant visual impact on the neighbouring properties. It will also be visible from Walberton Parish as it will be above the horizon (3 miles away at sea level) as a major blot on our landscape.

Air Quality

The prevailing wind for the area is from the south-west (West Sussex Life 2014 p 118, pub. West Sussex County Council). This will bring gaseous discharges towards Arundel and the South Downs National Park.

The developer provides a report with predicted air quality impacts.

- In some places the report lists a number of different Receptors at which impacts are predicted. We note that even Walberton Parish (Receptor 24) is predicted to receive an amount of pollution from the site.
- Heavy metal pollutants are only considered at 'the point of maximum impact' with reference to an Air Quality Assessment Level (AQAL).
 - Arsenic is noted to exceed AQAL
 - Chromium (VI) is noted to exceed AQAL by in excess of 2500%
 - It is highly desirable to know the level of toxic metals predicted at the various sites rather than just the point of maximum impact, for example the nearby Local Primary School (Receptor 10 – Yapton Primary School) and the proposed Arun District Council Secondary School site (Receptor 20).
- Our understanding of the document is that comparison is made to an unidentified 'currently permitted facility'. We are concerned that this vague reference means that comparison may not be taking place with a state-of-the-art plant built to the latest exacting emissions standards and could be another substandard but still operating plant chosen to improve the figures presented.
- Given the variable quality and nature of the fuel used (as household waste is of variable type), exact prediction of the issues is challenging and in the worst case scenario may be underestimated.

Conflict with existing planning policies

The proposed development appears to be in conflict with a range of planning policies, both local and national.

- Walberton Neighbourhood Plan 2020, Policy VE13 (Protected Views and Vistas)
 - The site impacts protected views 2 and 3
 - Although the 2020 Plan is at Regulation 14 level and not 'made' due to delays from COVID-19, the authorities have indicated that it may still be considered as relevant to planning decisions.
- National Planning Policy Framework (NPPF) paragraph 148: "The planning system should support the transition to a low carbon future ... shape places in ways that contribute to radical reductions in greenhouse gas emissions"
- NPPF paragraph 172: "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks..."
 - This impacts adversely on the scenic beauty of the SDNP as described above.
- SDNP - H1.11 Policy LAND M1 (Protection of Landscape Character): "**Development** within the setting of the South Downs National Park **must have special regard to the conservation of that**

setting, including views into and out of the Park, and will not be permitted where there would be harmful effects on these considerations.”

- We note the reference to views out of the Park which will be adversely impacted.
- Ford Parish Council’s made Neighbourhood Plan
 - Policy SA1 (Ford Airfield)
 - Provides for 1500 dwellings, play spaces and allotments. An incinerator immediately adjacent will compromise the quality of this key local development.
 - Policy EH2 (Renewable Energy): “The siting, scale, design and impact on heritage assets, landscape, views and wildlife of the energy generating infrastructure is minimised and does not compromise public safety and allows continued safe use of public rights of way”
 - The size of this proposal will impact significantly on landscape and views. Public safety may be impacted by pollution.
 - Policy EE1 (Support for Business Development): “Development proposals to upgrade or extend existing employment buildings ... will be supported unless the proposal would cause unacceptable harm to the amenities of surrounding properties, landscape ...”
 - We consider the potential harm to the landscape to be unacceptable.
 - Policy EE10 (Quality of Design of Commercial Buildings): “Proposals for new or extension or alteration of existing commercial premises must be of high quality design, be energy efficient and designed to be in harmony with the landscape setting and contribute positively to the environment.”
 - We consider the environmental contribution to be negative and the proposal not to be in harmony with the landscape setting.
 - Policy SP1 (Spatial Plan for the Parish)
 - SP1.1: “supports development on land within the settlement boundary but only if it is considered to be suitable for development against other Plan policies.”
- ADC Local Plan Policy H SP2, relating in part to Ford NP Policy SA1: “c. Protects, conserves or enhances the natural environment, landscapes and biodiversity.”
 - This development is unlikely to provide such an enhancement

Waste handling status

Although calculation of R1 values is included in the supporting documentation, there is no official confirmation from the Environment Agency that R1 status is met with the proposed design. This is required for the functioning of the facility as a recovery facility. Similarly, we have failed to locate in the documentation provided reference to the environmental permit application.

Traffic

The site presents a number of potential traffic issues.

- The stated level of HGV movements is 120 in and 120 out per day. This gives 240 HGV movements per 14 hour period or 1 movement every 3.5 minutes. Immediate local roads are minor and the A259 to the south is already busy. The plan is for 275,000 tonnes of waste to be handled per year, a considerable amount.

- The North End Road (North of Ford Lane) traffic is shown as increasing from a total of 10,474 to 13,089 yet the HGV increase is forecast to be zero. Yapton Lane, which is the continuation of North End Road north of the level crossing in Walberton Parish, has about 4% HGV traffic.
- Three of the possible offline A27 Arundel bypass routes cross the top of Walberton Parish enabling easy access to the A27. We therefore believe that the HGV increase on Yapton Lane will be considerable.
- There will be added conflict with the extra traffic from the new housing estate – 1500 houses could give 3000 extra cars to conflict with these HGV movements.
- HGVs will generate pollution – including noise and diesel particulates - near to residential areas.

Major incident safety

There will be quantities of household waste stored on the site while it is sorted and processed. There have been a number of fires at Household Waste Recycling Centres linked with the presence of lithium batteries, not uncommonly found in household waste despite advice being to separate batteries from devices before disposal.

A fire immediately next door to the new Ford Airfield housing estate will result in major issues with hazardous fumes. The results of the recent Westhampnett Recycling Centre experience are noted; these fires can be difficult to extinguish.

The presence of chemical and fuel stores on site (ammonia and diesel) increases concern should there be a major incident.

Walberton Parish Council

1st August 2020