

From: James Neave
Sent: 06 March 2014 15:52
To: Nat Slade; Peter Cleveland
Subject: WSCC/096/13/F - Ford Waste Treatment Facility - Further Information
Attachments: WSCC Acoustic Consultant.pdf; Environment Agency response.pdf; Public Health England response.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Peter/Nat,

Further information requested by WSCC has now been received from the applicant regarding this application, available to view on our website;

<http://buildings.westsussex.gov.uk/ePlanningOPS/loadFullDetails.do?aplId=1613>

This has been sent as a consultation through the usual channels, but I thought it would be best to bring it to your early attention.

Peter:

- I have received a number of third party comments with respect to potential views/impacts to nearby conservation areas/listed buildings. Is it possible to include the comments of the ADC Conservation Officer with this latest submission please?
- In addition, questions have been raised about potential cumulative impacts, accordingly, please could you let me know if ADC are aware of any developments that might act cumulatively with these proposals (one third party also mentioned conflict with the SHLAA site 71).
- Please also note the further info specifically addresses the stack height at paragraph 5.3.
- Please see appendix 4 (revised access layouts), this proposal seems to have a direct impact on the Flying Fortress Car-Park that seems not to have been laid out in accordance with ADC approved plans (F/1/04)
- The applicant has re-addressed noise impacts in light of EHO and WSCC acoustic consultant comments (attached)

Nat:

Thank you very much for your previous comments relating to Air Quality. You will note that this further information specifically addresses some of your noise concerns, particularly with regard to night time activities, noise survey methodology, standards used, and potential impacts of HGV noise (see also proposed acoustic fence at appendix 4 of the further information). I realise that the submitted further information is unlikely to affect your previous comments relating to air quality, however, I would be grateful if you could confirm that is the case, and provide new comments with respect to noise and land contamination if necessary (See EA response attached). As always, I would be grateful if you could confirm or otherwise whether you are satisfied with their methodology (particularly with regard to HGV noise) and conclusions, recommending conditions where necessary.

Your comments are requested on or before 27th March 2014.

I look forward to hearing from you, and please do not hesitate to contact me should you have any questions.

Kind regards,

James Neave

James Neave | Planner, Communities & Infrastructure, [West Sussex County Council](#) | Location: Strategic Planning Business Unit,
2nd Floor Northleigh, County Hall, Chichester, PO19 1RH



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Mr James Neave
West Sussex County Council
Minerals & Waste Policy
County Hall Tower Street
Chichester
West Sussex
PO19 1RL

Our ref: HA/2013/115069/01-L01
Your ref: WSCC/096/13/F
Date: 19 December 2013

Dear Mr Neave

PROPOSED DEVELOPMENT AND OPERATION OF A WASTE TREATMENT FACILITY NEW CIRCULAR TECHNOLOGY PARK (FORMER FORD BLOCKWORKS), FORD AIRFIELD INDUSTRIAL ESTATE, FORD, ARUNDEL, WEST SUSSEX, BN18 0HY

Thank you for your consultation on this proposal. Please quote our reference number in any correspondence.

Environment Agency Position

We consider that planning permission should only be granted to the proposed development as submitted if the following planning conditions are imposed as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the application.

Condition 1

No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1. A site investigation scheme, based on the Phase 1 Environmental Site Assessment to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
2. The results of the site investigation and the detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages,

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Customer services line: 03708 506 506
www.environment-agency.gov.uk

Cont/d..

maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reasons: The site lies above Lewes Nodular Chalk formation which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical use(s) as a 'Works' and a historic landfill. Any contamination present may pose a risk to groundwater underlying the site.

Condition 2

No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reasons: To ensure that any remediation, if deemed necessary is satisfactorily completed.

Condition 3

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reasons: To ensure that any contamination identified during the construction works is fully characterised and assessed.

Condition 4

No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To ensure that surface water drainage from the proposed development does not result in a deterioration of groundwater quality.

Condition 5

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no

resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: Piling or any other foundation designs using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater.

Condition 6

Prior to any development commencing a Method Statement shall be submitted to and be approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved Method Statement.

The submitted Method Statement must include details of:

1. The Method of Construction;
2. The Method of Demolition;
3. The Method of Controlling & Discharging Groundwater during construction
4. Risk Assessments to be undertaken relating to groundwater and surface waters associated on and off the site that may be affected by the above.

Reason: The site is in a very sensitive location with respect to Controlled Waters that are vulnerable to pollution. It is also known that the site is contaminated. In order to protect and prevent unacceptable risk of contamination of surface water and underlying groundwater, the method of demolition, construction and controlling groundwater and its discharge during construction will need to be carefully considered by the developer.

All work should be undertaken in accordance with best practice and pollution prevention guidance, particularly our Pollution Prevention Guidance note 6 *Working at construction and demolition sites*.

Supporting Notes

Environmental Permitting Regulations 2010

This proposed waste treatment facility will require a bespoke Environmental Permit in order to operate. We have initiated discussions with Grundon Waste Management to this effect.

Through permit requirements and conditions we will regulate emissions to air, land and water and ensure that the plant is operated to BAT (Best Available Technique). We also regulate noise and odour from the process.

The permit will also control the types of waste handled on site and the types of fuels used.

We do not regulate transport related impacts.

Further information on how we regulate waste incineration and energy recovery facilities is available from our website here:

<http://www.environment-agency.gov.uk/business/sectors/143711.aspx>
and a factsheet on energy from waste plants:

Combined Heat and Power options

We will require all new energy from waste plants (that don't include Combined Heat and Power (CHP) from the outset) to be CHP-ready to a sufficient degree dictated by the likely future technically viable opportunities for heat supply in the vicinity of the plant. Environmental permit applications for these types of plants will, therefore, need to include a BAT assessment for CHP-readiness. We have produced a guidance note for this here: http://a0768b4a8a31e106d8b0-50dc802554eb38a24458b98ff72d550b.r19.cf3.rackcdn.com/LIT_7978_e06fa0.pdf

Permits for these plants are also likely to contain conditions that state opportunities to realise CHP should be reviewed from time to time. These opportunities may be created both by new building heat loads near the plant, and/or be due to changes in policy and financial incentives that make it more economically viable for the plant to be CHP.

We would advise that the operator, in conjunction with WSCC and Arun District Council, explore the feasibility of CHP options within the locality.

Flood Risk

Please consult with your own drainage team on flood risk aspects.

Contaminated Land Assessment

We have reviewed the Phase 1 Environmental Site Assessment as submitted by Golder Associates (UK) Ltd (September, 2012). We agree with the conclusions and recommendations in the report that it would be necessary to investigate areas of potential concern to establish baseline ground conditions for the site. This should include (and not be limited to) the area of the former above ground gas oil tanks, the substation, the former refuelling area and storage areas for oil and HCL.

As the site is located on a principal aquifer it will be necessary to provide further details on the drainage scheme for disposal of surface water. We will support the use of SUDs for new discharges, including clean roof water, provided all down-pipes are sealed against pollutants entering the system from surface run-off. The method of discharge must not create new pathways for pollutants to groundwater or mobilise contaminants already in the ground.

Therefore no infiltration should be permitted through land that is impacted by contamination. Runoff from roads, car parking and amenity areas should have a suitable series of treatment steps to prevent pollution of groundwater. A drainage plan is required to illustrate the appropriate surface water drainage disposal method.

We recommend that developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human

health.

We would like to refer the developer to our groundwater policies in Groundwater Protection: Principles and Practice, available from our website: <http://www.environment-agency.gov.uk/research/library/publications/144346.aspx>. This sets out our position for a wide range of activities and developments, including the discharge of liquid effluents, land contamination and drainage.

Please contact me if you have any questions.

Yours sincerely

Mr Mark Luker
Environment Agency Planning Advisor

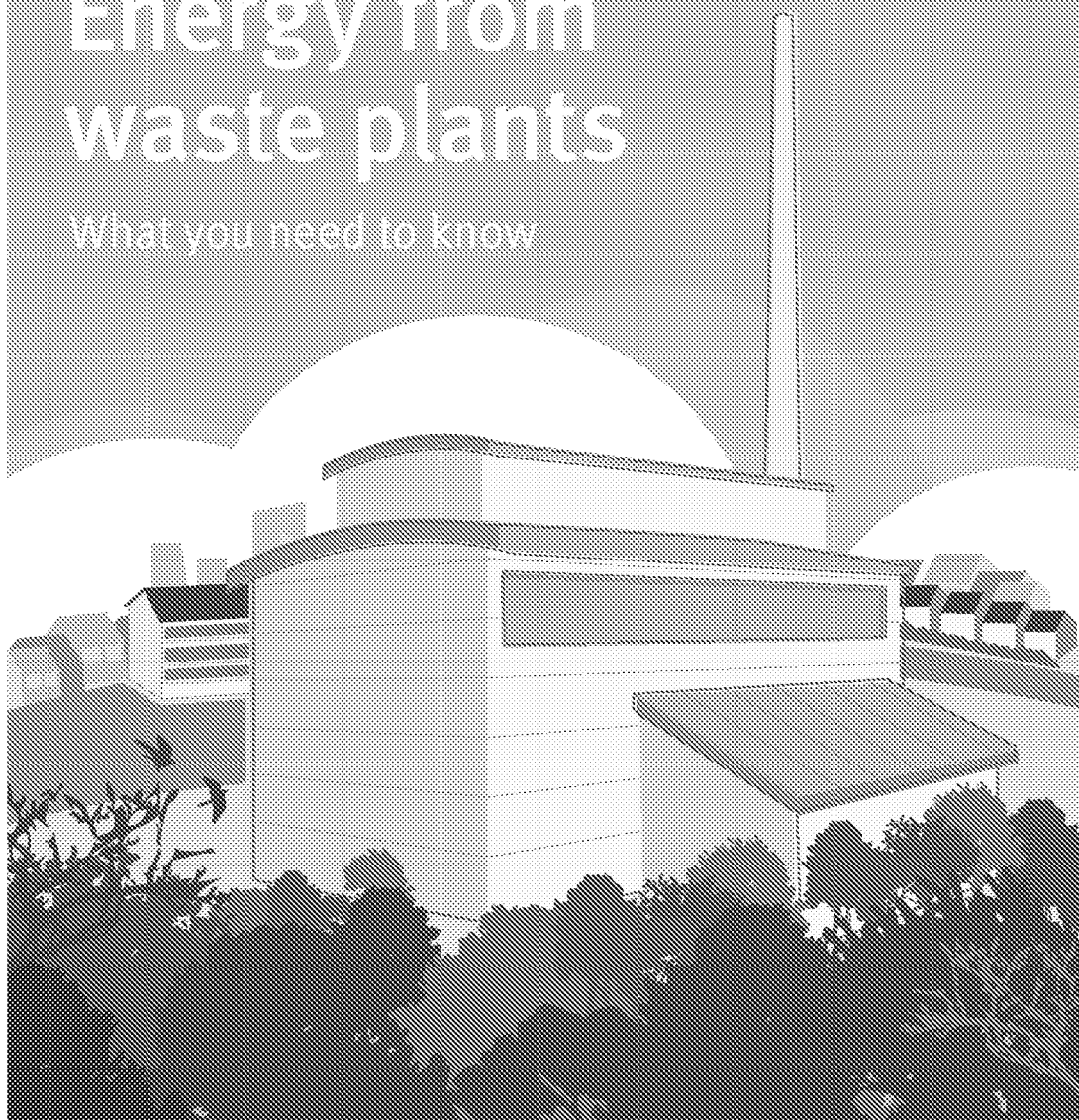




Environment
Agency

Energy from waste plants

What you need to know



We are the Environment Agency.

It is our job to look after your environment and make it
a better place not just for you but for the future generations
that will follow us.

Your environment is the air you breathe, the water you drink
and the ground you walk on.

We are working with business, Government and society as a
whole to make your environment cleaner and healthier.

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Waste – the key issues

In 2007/2008 local authorities in England collected over 25 million tonnes of household waste.

While good progress is being made in recycling more of England and Wales' waste, we must do even more to reduce our effects on the environment. We need to make sure that we reduce the amount of waste produced in the first place and reuse and recycle as much of it as possible.



Unfortunately, there will continue to be some household waste that cannot be reused or recycled, either for technical or financial reasons. This is known as 'residual waste'. Most of this residual household waste is currently disposed of in landfill sites. This is the least environmentally friendly option and there is less and less landfill space available.

Under the European Union Landfill Directive, we must reduce the amount of waste that we send to landfill. This means we must find other ways of managing it.

Local authorities are responsible for managing our household waste. They make long-term plans to do this, identifying ways of increasing recycling and deciding how to dispose of the residual waste. At the moment, the main alternative to landfill is incinerating the waste in energy from waste plants. This is a proven technology which is widely used across Europe.



What are energy from waste plants?

Modern incinerators are often called energy from waste plants. These plants burn waste at high temperatures to reduce the amount of waste and the space it takes up. They also allow the energy produced during the burning process to be captured. This is used to generate electricity and, if possible, provide heating for local buildings or for use in industrial processes.

Our position on energy from waste plants

We need to create less waste, reuse and recycle more and make the best use of the energy contained in the waste that can't be recycled.

It may be appropriate for local authorities to include energy from waste plants in their long-term plans.



As long as this:

- does not affect their strategies to reduce the amount of waste produced or increase the amount that is reused and recycled
- forms part of a regional or local waste management strategy
- helps develop a network of waste disposal and treatment facilities so that waste is disposed of or treated near to where it is produced.

Planning application

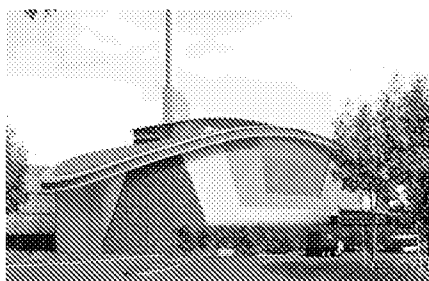
Before an energy from waste plant (or any other waste incinerator) can be built, the operator must apply for, and be granted, planning permission from the local planning authority. The planning application will give details of the type of facility the operator plans to run and where it will be. We are consulted as part of this process. We will give our views on how the proposals could affect the environment. We do not decide if or where a facility is built or whether planning permission should be granted.

Environmental permits

As well as planning permission, the operator must get an environmental permit from us before they can run an energy from waste plant.

We use permits issued under the Environmental Permitting

Regulations 2007 to regulate many types of waste management facilities, including energy from waste plants. These permits have strict conditions to make sure the facilities will not cause significant pollution to the environment or harm people's health.



When applying for a permit, the operator will provide detailed information on the type of facility, how it will be built and run, and how it could affect the environment. We will only grant a permit if the operator applying has shown that the proposed facility meets the requirements of UK and European laws in how it will be designed and run. We will not grant a permit if we believe it is likely to cause significant pollution to the environment or harm people's health.



Emissions

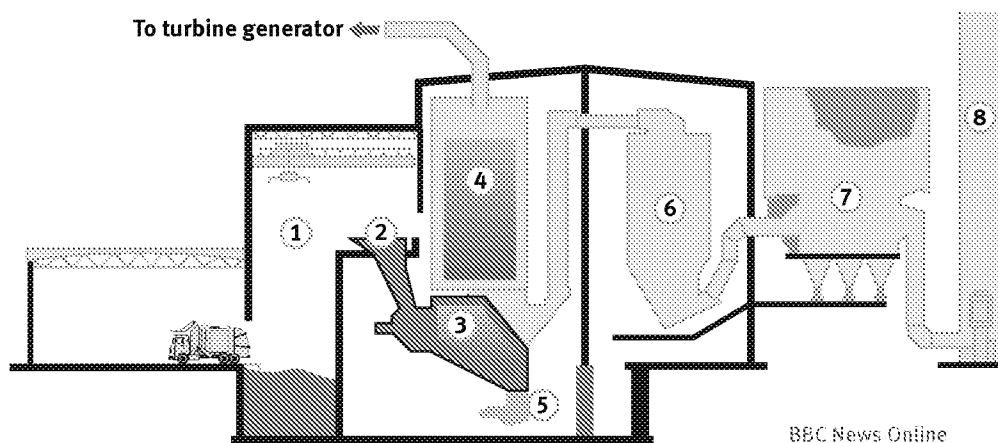
The incineration process, and the emissions which incinerating waste releases into the air, are tightly regulated and controlled by laws under the Waste Incineration Directive (WID) and the Integrated Pollution Prevention and Control Directive (IPPC). Under these European Directives, the plant must meet or go beyond strict controls on emissions.

To do this, the plant must be equipped with technology which will limit the amount of polluting substances that are released. The facility must also be fitted with equipment which will monitor the gases released into the air and report the results to us. We will regularly check that the operator is meeting the conditions of the permit. If they do not keep to these conditions, we will take appropriate action against them to make sure they do.



Veolia Environmental Services Energy from Waste facility in Sheffield

How it works: mass burn incineration



Waste is tipped into a holding area ① where it is picked up by grabs and dropped into a hopper ②. The waste is pushed gradually into the incinerator ③ which runs at a temperature of 850 degrees Celsius. Heat from the burning waste is used in a boiler ④ and steam from this is piped to a turbine generator to create electricity. The heaviest ash falls into a collection point ⑤ and is passed over with an electromagnet to extract metal content for recycling. Flue gases containing fine ash then pass through a scrubber reactor ⑥ to treat acid pollutants such as SO_2 and also dioxins. The gases then pass through a fine particulate removal system ⑦ and are released through the chimney stack ⑧.



Health

We have an important role to play in protecting health as part of our legal duties. We use information provided by the operator to consider how the facility may affect people's health. This includes comparing emissions with industry standards and limits set by regulations.

We will look in detail at what emissions the facility will release and how this could affect the local environment. As part of this, we will consider expert scientific opinion and research reports on health effects due to emissions. We are not health professionals, so to make this assessment we work closely with medical and public-health experts at the Department of Health, Health Protection Agency and National Public Health Service.

The Health Protection Agency has published a statement on incinerating solid waste, which says that "modern, well-managed waste incinerators will only make a very small contribution to background levels of air pollution". This opinion is based on a detailed review of the research available.



Public consultation

We want to make the best decision when we issue an environmental permit. As a result, we consult widely with organisations and members of the public, inviting them to make any comments and ask any questions they may have about the details in the application. Our consultation period will usually last for 20 working days and we will advertise the details of the application in local newspapers and on our website.



Once we have decided on the application, we will issue a draft decision and consult the public and other people involved before we issue our final decision.

The facility can only begin incinerating waste when it has been granted both planning permission and an environmental permit.



Who we are

We are the Environment Agency. It's our role to look after your environment and make it a better place – for you, and for future generations.

Your environment is the air you breathe, the water you drink and the ground you walk on. We are working with business, Government and society as a whole to make your environment cleaner and healthier.

The Environment Agency. Out there, making your environment a better place.

What we do

We protect and improve water and air quality and make sure waste management activities do not cause pollution or harm to human health.

We regulate waste disposal and those industrial processes with the greatest potential for causing pollution.

Our role is to make sure that energy from waste facilities are designed, built and run to meet strict environmental standards and the conditions of their environmental permits.



Where can I find out more information?

For more information about energy from waste incineration and our role in planning and issuing permits for these, visit our website at: www.environment-agency.gov.uk/energyfromwaste

Health Protection Agency (HPA)

To see the HPA's statement on incinerating solid waste, visit the following website:

www.hpa.org.uk/web/HPAweb/HPAwebStandard/HPAweb_C/1195733822068

Department for Environment, Food and Rural Affairs (Defra)

To see Defra's guidance on incinerating solid waste, visit the following website:

www.defra.gov.uk/environment/waste/wip/newtech/pdf/incineration.pdf

County or unitary council

Contact your county or unitary council to find out about their strategies and plans for waste, including the:

- municipal waste management strategy
- waste development plan
- policy on recycling waste
- regional waste strategy the council contributes to.

Contact us

Phone: National Customer Contact Centre on 08706 506 506

E-mail: enquiries@environment-agency.gov.uk

Website: www.environment-agency.gov.uk

Would you like to find out more about us, or about your environment?

Then call us on

08708 506 506 (Monday to Friday, 8am to 6pm)

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SW1W 9SZ
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F: 020 7811 7759

21 February 2014

Dear Mr Neave

Planning application for: Grundon Waste Management Limited; New Circular Technology Park (Former Ford Blockworks), Ford Airfield Industrial Estate, Ford, Arundel, West Sussex, BN18 0HY
Reference: WSCC/096/13/F

Thank you for consulting Public Health England (PHE) on the above planning application on 31 January 2014. It is understood that the application is for a proposed waste treatment facility comprising a material recovery / recycling facility and a Residual Waste Treatment Facility employing gasification technology with a capacity of 140,000 tpa.

The site is located in a predominantly rural area. The closest residential receptors to the site lie approximately 250m to the north east of the proposed site. Residential properties are also located approximately 500m to the south and east. Other potentially sensitive public receptors within the area include those using nearby public rights of way, and Ford Open Prison lies 300m to the south east of the site.

The applicant has commissioned detailed dispersion modelling which was used to predict the ground level concentration of pollutants on a long term and short term basis across a grid of points. In addition concentrations were predicted at the identified sensitive receptors.

The air quality dispersion modelling submitted as part of the planning application shows that the process contribution of pollutants from the proposed Residual Waste Treatment Facility would be considered as 'insignificant' or 'negligible'. Assessment of traffic contributions were considered but not brought into the air quality calculations as the low number of vehicle movements allows this source to be screened out. The planning authority will need to be satisfied that the exclusion of traffic contributions to any air quality impacts is appropriate.

Existing background air pollutant concentrations in the area are well below Air Quality Objectives and the applicant concludes that no exceedance of these standards is anticipated.

Public Health England (PHE) recognises that there are public concerns about air pollution from incinerators and health. The operators of modern waste incinerators are required to monitor emissions to ensure that they comply, as a minimum, with the limits in the EU Waste Incineration Directive (2000/76/EC), which sets strict emission limits for pollutants.

The incineration process can result in potential sources of exposure from emissions to the atmosphere or via solid ash residues. Provided that solid ash residues are handled and disposed of appropriately, atmospheric emissions remain the only potential route of exposure to people. The dispersion modelling submitted as part of the planning application suggests that emissions to air will be insignificant or negligible.

This site will require a bespoke Environmental Permit from the Environment Agency (EA). The EA consults Public Health England (PHE) on such permit applications, and PHE can make specific observations and recommendations for conditions within any permit granted. The permit itself will set out strict operating requirements which must be complied with; this will include monitoring.

Based on the information contained in the application provided, PHE has no significant concerns regarding risk to health of the local population from emissions to air from this proposed activity, providing that the applicant takes all appropriate measures to prevent or control pollution, in accordance with the relevant sector technical guidance or industry best practice.

We would suggest that the Director of Public Health should be consulted for matters relating to wider public health impacts, such as potential impacts from traffic and noise.

Yours sincerely



Catherine Keshishian
Environmental Public Health Scientist



CC: Lisa Harvey-Vince, Alison Mason, Jennifer Duffy – Kent, Surrey and Sussex PHE Centre

Acoustic Associates Sussex Ltd

Review of a Noise Impact Assessment relating to a Proposed Waste Treatment Facility at Ford, Sussex

Site: New Circular Technology Park, Ford Airfield Industrial Estate,
Ford, Arundel, West Sussex BN18 0HY

Report by : Peter Attwood BSc(Hons) MSc MCIOB MIOA MIDiagE

Date : 5th February 2014

Planning Ref: WSCC/096/13/F



Acoustic Associates

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NOISE CONSULTANTS

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BUILDING NOISE DIAGNOSTIC TEAM

Introduction

This document provides a review of a Noise Impact Assessment, which itself forms Chapter 8 of the Environmental Statement, dated October 2013, provided in support of the application by Grundon Waste Management Ltd.

The Environmental Statement is provided under The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 in support of an application to construct and operate a Waste Treatment Facility at the New Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, West Sussex BN18 0HY.

This review covers the acoustic aspects of the application.

General Comments

The noise assessment provided as a part of the Environmental Statement has been examined and the following points have been considered:

- i) the appropriateness of the Standards used, e.g. BS4142, BS5228, BS8233
- ii) the methodology employed for the noise assessment
- iii) the noise levels predicted to be 'received' at the positions of the nearest noise-sensitive receptors (NSRs), e.g. residential properties, Ford Prison, public rights of way
- iv) the recommended noise limits at the NSRs and how the predicted noise levels compare with these
- v) the depth of information provided regarding the plant and equipment that will operate at the Facility and regarding the road traffic that will be associated with a) its construction and b) its operational phase, once constructed
- vi) possible Planning Conditions that could be attached to the scheme, were Planning Consent to be granted

Operational Phase

Vehicle Movements

There are predicted to be 107 vehicle movements along each access road (west access from Yapton Road and east egress to Ford Road). These comprise 60 lorry movements plus 47 car movements.

From the text of the assessment, a shift rota will be in operation for the Waste Treatment Facility. The times of shift changeovers are unclear, though it is suggested in Section 7 of the assessment that 12 hour shifts are envisaged, with shift changeovers around 07:00 and 19:00. This means that car movements are likely to be concentrated around these times.

Lorry movements are predicted to be fairly evenly spread through the day between 07:30 – 17:00, departing the site on the east access. It is not clear when these vehicles would be arriving at the site from the west. Additionally, the predicted noise levels associated with these vehicle movements are not clear.

It is recommended that clarification be sought from the applicant regarding the traffic flows and the consequent predicted vehicle noise levels at the noise-sensitive residences during the operational phase, both to the west and the east of the site.

Noise from the Waste Treatment Facility

The assessment provides predictions in Appendix 8.4 that the levels of noise from the operation of the Waste Treatment Facility itself will range between LAeq 19 – 35dBA at the NSRs for which figures have been provided.

It is noted that there is some disparity between the predicted noise levels for the BS4142 assessment and the BS8233 assessment. Some figures disagree between the two assessments.

It is recommended that clarification be sought from the Applicant regarding the predicted noise levels at the NSRs in the context of the BS4142 and BS8233 Assessments. Additionally, further information should be provided regarding the background noise levels surveys to allow an assessment of the variation in background noise levels during both daytime and night periods.

It is considered, however, that if the noise levels from the Waste Treatment Facility are indeed LAeq 35dBA or below, as received outside the residential properties, then these are not likely to give rise to noise nuisance for the local residential occupiers, provided the noise is not tonal and does not contain impulsive elements (bangs, crashes etc).

Construction Phase

During the construction of a project such as the proposed Waste treatment Facility at Ford Aerodrome, it is normal for noise to be assessed in accordance with, and using the guidance from, BS5228: 2009: Code of Practice for noise and vibration control on construction and open sites: Part 1: Noise.

Similarly, vibration aspects of the proposals would be assessed using Part 2: Vibration, of the same Standard. The assessment has concluded that, due to the significant distances involved between the plant and equipment to be used at the Facility and the NSRs, vibration will not be an issue in this case. Our own assessment is that this conclusion is valid.

Annex E of the BS5228 Standard provides guidance with regard to noise limits to be regarded as acceptable during the construction phase of the project. These are provided at Sections E.2, E.3.1 and E.3.2 of that Standard.

The applicant has used the guidance of Section E.2 which, in turn, quotes from the 1976 version of a document known as Advisory Leaflet 72 and this states that:
“Noise levels, between say 07:00 and 19:00 hours, outside the nearest window of the occupied room closest to the site boundary should not exceed:

- 70 decibels (dBA) in rural, suburban and urban areas away from main road traffic and industrial noise
- 75 decibels (dBA) in urban areas near main roads in heavy industrial areas”

The applicant relies upon the figure of 70dBA as a target maximum noise level.

However, the advice in Section E.2 is not clearly written and is superseded at Sections E.3.2 and E.3.3 of the Standard. These provide guidance that a significant effect is deemed to occur if the LAeq noise level, including construction, exceeds a threshold level of 65dBA during the daytime.

We would recommend that the limit of LAeq 65dBA be applied during the daytime (07:00 – 19:00 Mon-Fri and 07:00 – 13:00 Saturday); 55dBA for the evening and weekends and 45dBA at night (23:00 – 07:00) in accordance with Sections E.3.2 and E.3.3 of BS5228.

The construction noise levels predicted by the applicant are lower than LAeq 52 dBA at the nearest noise sensitive receptor (Appendix 8.1 of the assessment). It is, therefore, considered that the predicted level falls within the acceptability criterion for daytime.

Noise from construction traffic

The thresholds of impact magnitude, as used by the assessment at paragraph 8.4.25 and Table 8.7, are queried.

There is disagreement between the 'impact magnitudes' as set out in these paragraphs and the 'Magnitudes of Noise Impacts' set out in the Design Manual for Roads and Bridges; a document which is commonly referred-to for guidance with regard to construction traffic.

The levels of noise reaching the residential properties on the west and east access roads are not quantified in the assessment.

It is considered that insufficient evidence is provided to substantiate the assertion (paragraph 8.6.3) that the effect of construction traffic, including but not limited to HGVs, is 'negligible'. According to table 8.7, this would mean a noise change of <6dBA on the access roads to the site. The calculations for this have not been shown. Nor is this in accordance with the guidance provided by DMRB, as above.

On the basis of a zero traffic baseline condition (i.e. there is no construction traffic on the access roads at present), the use of the roads by up to 25 HGVs and an unknown number of cars associated with the construction work per day is bound to give rise to some increase in noise levels at the NSRs. The degree of this increase needs to be quantified.

Further information is required to show the existing and construction-phase traffic flow volumes and distribution throughout the day. Also required is further information regarding the existing traffic noise levels and the predicted traffic noise levels affecting the NSRs close to the local access roads should the application be successful. This should include the whole length of the access road from its junction with Yapton Road and to its junction with Ford Road.

Public Rights of Way

It is noted that there are a number of Public Footpaths within close proximity to the proposed Waste Treatment Facility and the access roads.

Examination of the noise contour plots provided within the Applicant's noise assessment appendices indicates that the noise levels reaching the footpaths are likely to be in the order 35 – 45dBA. However, no accurate predictions are provided for these Public Rights of Way. It is considered that these also merit consideration as Noise Sensitive Receptors as they are used by members of the public for recreational purposes.

Noise contour plots from computer modelling provide an approximation of the noise level to be expected at any given position but do not allow an accurate evaluation. Within noise models, this is normally provided by specifying discrete receptor positions rather than relying on the noise contours. This would equally be the case for identified positions outside residential properties and it is assumed (though not stated in the assessment) that this is how the values were arrived-at for the predicted noise levels outside the identified properties in Appendix 8.4.

Further information is required from the Applicant, showing the noise levels to be expected at the Rights of Way, resulting from the operational and construction phases of the proposed Facility and including for the noise effects of vehicle movements.

Proposed Noise Conditions in the event that Planning Consent is granted

If the Planning Application for the Waste Treatment Facility at Ford is granted consent then it is recommended that appropriate noise Conditions be attached to such consent. This will ensure continued protection from noise for present and future occupiers of nearby Noise Sensitive Premises.

Appropriate wording for Conditions could be as follows:

Construction Phase:

Noise from construction activities or from vehicle traffic associated with the construction of the proposed Waste Treatment Facility at the Circular Technology Park at Ford shall not exceed a level of
 $L_{Aeq,1hr}$ 65dBA between the hours of 07:00 – 19:00 Monday to Friday and 07:00 – 13:00 Saturday
 $L_{Aeq,1hr}$ 55dBA during evenings and weekends
 $L_{Aeq,1hr}$ 45dBA at night-time (23:00 – 07:00)

Noise levels to be measured at the boundaries of any of the existing noise sensitive properties close to the site on Rollaston Park or Beagle Drive to the west or on Rodney Crescent to the east

Operational Phase:

The Rating Level of noise emitted from the site (determined in accordance with BS4142:1990) shall not exceed a level of 36dBA between the hours of 07:00 – 19:00 Monday to Friday and 07:00 – 13:00 Saturday and 35dBA at any other time.

Noise levels to be measured at the boundaries of any of the existing noise sensitive properties close to the site on Rollaston Park or Beagle Drive to the west or on Rodney Crescent to the east or at Ford Prison to the south.

Summary of further information required

1. *It is recommended that clarification be sought from the applicant regarding the traffic flows and the consequent predicted vehicle noise levels at the noise-sensitive residences during the operational phase, both to the west and the east of the site.*
2. *It is recommended that clarification be sought regarding the predicted noise levels at the NSRs in the context of the BS4142 and BS8233 Assessment values. Additionally, further information should be provided regarding the background noise levels surveys to allow an assessment of the variation in background noise levels during both daytime and night periods.*
3. *Further information is required to show the existing and construction-phase traffic flow volumes and distribution throughout the day. Also required is further information regarding the existing traffic noise levels and the predicted traffic noise levels affecting the NSRs close to the local access roads should the application be successful. This should include the whole length of the access road from its junction with Yapton Road and to its junction with Ford Road.*
4. *Further information is required from the Applicant, showing the noise levels to be expected at the Rights of Way close to the Application Site, resulting from the operational and construction phases of the proposed Facility and including for the noise effects of vehicle movements.*