



By Appointment to
Her Majesty The Queen
Waste Management
Grundon Waste Management Ltd
Colnbrook

GRUNDON

www.grundon.com

ESTATES OFFICE

West Sussex County Council

County Planning
County Hall
Chichester
West Sussex
PO19 1RH

Sent by Email and Post

6 May 2014

For the Attention of Mr. James Neave, Planning Department, Communities & Infrastructure

Dear James,

Planning Application Ref. WSCC/096/F/13 (Development and Operation of a Waste Treatment Facility) at the New Circular Technology Park (Former Ford Blockworks), Ford Airfield Industrial Estate, Ford, Arundel, West Sussex, BN18 0HY

Additional Clarifications

Please see below additional comments and clarifications, following our response to the Regulation 22 request which was formally submitted to the County Council on 21st February 2014.

Further Highway Comments:

Additional highways comments from the County Highway Officer were received on 2nd April 2014 and have now been addressed.

Further Noise Comments:

Additional clarifications were sought by Acoustic Associates Sussex Ltd on behalf of the County Council on the Noise Impact Assessment for the proposals. These have now been addressed.

Road Resurfacing:

In your email dated 3rd April 2014 to my colleague Stewart Mitchell, you enquired about the extent of the road resurfacing on the eastern access. As we indicated in our formal response to the Regulation 22 request (para. 2.3.1), Grundon have committed to the resurfacing of the section of the access road opposite to Rodney Crescent with a specialised noise-reducing tarmac. This is in order to minimise the potential noise impact from HGVs travelling on this stretch of the access road, on the residential properties of Rodney Crescent.

A similar provision on the remainder of the access road (from the main part of the Application Site to this stretch of the road opposite to residential properties of Rodney Crescent) would have little noise-reduction benefit, due to the distance separating it to those properties. This part of the road is in good state of repair and it is therefore not proposed to resurface it at this stage. Notwithstanding this, it will be regularly maintained and repaired, as and when required.

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Acoustic Fence:

In your email dated 3rd April 2014, you also enquired about the extent of the acoustic fence to be provided on the eastern access road opposite to the residential properties of Rodney Crescent. As indicated in our separately submitted clarifications on noise, we confirm that it is proposed that the acoustic fence will be extended to the point behind Rodney Crescent where the access road heads west across open fields.

Additional Objections from Ford Parish Council:

We note the latest objections submitted by Ford Parish Council dated 30th March 2014. Whilst most issues raised in Ford PC's letter have already been addressed in our response to the Regulation 22 request, we would like to add the following:

DEFRA - Energy From Waste: A Guide to the Debate

In its latest objection, Ford PC quotes extensive extracts from of the DEFRA publication '*Energy From Waste: A Guide to the Debate*'. This publication is a guide, with the purpose to "provide a starting point for discussions about the role energy from waste might have in managing waste". It is not a policy document in its own right (although it is based on Government policies and strategies). It was initially published in February 2013 (i.e. prior to the formal submission of the planning application for the proposed development) and therefore the planning application documentation was prepared with this in mind. The 2014 revised version of this Guide (published in February 2014 includes an additional section (chapter 5) which does not set out any new policy but "*identifies underlying principles that are likely to continue as key considerations for both government and the sector in the future*". Essentially, this seeks to reflect not only the primary purpose of energy from waste facilities in the waste hierarchy (i.e. diverting waste from landfill) but also its role in recovering energy, again, in line with Government policies and strategies (including the Government's draft '*Updated National Waste Planning Policy for England*' published in July 2013).

The planning application and accompanying Environmental Impact Assessment submitted for the proposed development includes an extensive review of existing and emerging European and UK Government policies and strategies and demonstrates that the proposals are in accordance with those policies and strategies. The latest revised publication from DEFRA does not include any new materials that alter this conclusion.

Public Consultation and Community Engagement

Ford PC's letter quotes para. 189 of the 2014 DEFRA Guide and claims that Grundon have not complied with the Guide's advice on community consultation.

Grundon have carried out comprehensive pre-application engagement and consultation with the local community, as set out in the '*Community Involvement Statement*' document submitted as part of the planning application. This is line with Government policy (National Planning Policy Framework) as well as West Sussex County Council's Statement of Community Involvement. As part of the public consultation and community engagement exercise, Grundon engaged early on with local political representatives; presentations of the proposals were made to the local Parish Councils (including Ford PC); site visits were organised (one of which was attended by Ford PC Chairman); a public exhibition was held on site and local residents, Parish, District and County Councillors (including Ford PC's Councillors) were invited at a pre-session to discuss the proposals with the project team; a website dedicated to the project has been created, providing information on the proposed development as well as a Contact page/Freephone information line service to respond to any enquiries from the local community.

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In the longer term, and as indicated in our response to the Regulation 22 request (para. 2.4.11), it is intended that a Community Liaison Group will be set up to keep local residents and other interested groups informed of the progress of the development, during the construction phase as well as once the site becomes operational.

In view of this, we do not accept Ford PC's objection on the ground that Grundon did not satisfactorily engage or consult the local community on the proposals.

Site Location and Energy Output

Ford PC's letter quotes para. 258 of the 2014 DEFRA Guide relating to the selection of waste development sites and claims that Grundon failed to demonstrate that the proposals comply with the Guide's key principle (i.e. effective use of energy output).

The DEFRA Guide does not (nor does any Government policies or strategies) preclude or seek to prevent the development of waste management facilities in rural locations. The Guide simply acknowledges that sites in urban centres and/or close to heat users should be preferred. Emerging Government's policy, in the draft *'Updated National Waste Planning Policy for England'* (July 2013), also currently includes policy additions which give a steer towards considering locating new energy from waste facilities alongside existing sewage treatment works, given the potential benefits of co-locating such facilities.

In this instance, the potential to utilise heat from the electricity generation process, through combined heat and power (CHP) generation, has been assessed as part of Grundon's proposals. The planning application submission includes an assessment of the potential heat users in close proximity to the site (*'Potential Heat Users in the Local Area'* report provided as part of the Planning Application Supporting Statement).

Grundon is committed to maximising the overall energy efficiency of the proposed facility which is designed to deliver a combination of electricity into the National Grid and district heating or power. There are ongoing and advanced discussions with a number of potential heat users, including Southern Water Services who operate the adjacent Waste Water Treatment Plant, West Sussex Growers Association who are seeking to develop a site nearby (which would use heat in greenhouses) or HM Prison Ford. Grundon is therefore confident that surplus heat from the development can be, in time, exported to local users, and that CHP is a viable option on this site.

Waste Framework Directive and 'R1' Status

The Waste Framework Directive (WFD) has contained a hierarchy of waste management methods since April 1993. In the revised WFD (Directive 2008/98/EC), the hierarchy prioritises waste prevention followed by preparing for reuse, recycling, recovery and finally, least favourably, disposal.

In this revised Directive, incineration facilities for municipal waste can be regarded as 'Recovery' operations ('R1') if the energy efficiency of the plant is greater than 0.65 for plants permitted after January 2009. Plants which do not meet this criterion are classed as 'Disposal' operations ('D10') and therefore lie on the same hierarchical level as landfill. It should also be noted that if the proposed facility were to fail the R1 status, it would not meet major customers' waste/environmental policies, which require their output to be recovered and not disposed of.

Using the *'R1 Energy Efficiency Formula'* to assess the energy efficiency of the plant and based on predicted design figures and predicted levels of fuel consumption and electricity usage, the R1 efficiency for the proposed facility at Ford is anticipated to be 0.7 without any heat export and 0.93 with exporting heat to the identified heat users. This is above the threshold for new (post 2009) incineration plants. On this basis, the proposed facility will meet the definition of Recovery, as set out in the revised WFD, with or without any heat export.

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Based on the above, we do not accept Ford PC's objection on the ground that the proposed development fails to meet the Waste Framework Directive's 'Recovery' definition.

Health Impact

We note the concerns from Ford PC on health risks, reiterated in their latest objection. We have addressed these comments in our response to the Regulation 22 request (Appendix 8: Other Consultation and Third Party Responses).

We note the correspondence from DEFRA and Public Health England (PHE) which accompany Ford PC's objection letter. As you are aware, the Environment Agency (EA), who regulate waste incineration and energy recovery facilities, has been consulted (consultation responses dated 19 December 2013 and 25 March 2014); the EA did not raise any concerns on the proposals on health/air quality impact and is satisfied with the information submitted as part of the planning application for the proposed development. PHE was similarly consulted (consultation responses dated 21 February 2014 and 5 March 2014) and, again, did not raise any concerns or issues in relation to the proposed development. As mentioned by both the EA and PHE, we confirm that an application for an Environmental Permit to cover the operation of the facility will be submitted to the EA in due course. Through the Permit, the EA will regulate emissions to air, land and water, ensure that the plant is operated to Best Available Technique, and also control the types of waste handled on site and the types of fuels used.

We trust the above clarifications address the issues and concerns raised by Ford PC in their latest correspondence.

Please do not hesitate to contact us should you have any queries or require any further information.

Yours sincerely,



Veronique Bensadou
Senior Planner

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