

Karen Garner

From: Lisa Coney on behalf of Planning
Sent: 02 December 2013 10:41
To: Karen Garner
Subject: FW: Correction: Planning Application WSCC/096/13/F- Waste Treatment Facility

From: Alison.Woodfield@westsussex.gov.uk [<mailto:Alison.Woodfield@westsussex.gov.uk>] **On Behalf Of**
Planning.Applications@westsussex.gov.uk

Sent: 02 December 2013 10:08

To: [REDACTED]; [REDACTED]; planning@southdowns.gov.uk;

[REDACTED]; [REDACTED]; [REDACTED];
Darryl.Hemmings@westsussex.gov.uk; Graham.Harris@westsussex.gov.uk; Emily.Delicata@westsussex.gov.uk;
SU.Local.Development@westsussex.gov.uk; Planning; [REDACTED]; [REDACTED];

Subject: Correction: Planning Application WSCC/096/13/F- Waste Treatment Facility

Please note that the Location address for this application has been changed from:

Proposed Waste Treatment Facility, Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY

to

New Circular Technology Park (Former Ford Blockworks), Ford Airfield Industrial Estate, Ford, Arundel, West Sussex, BN18 0HY

Regards
Alison

[Alison.Woodfield](#) | Planning Technician, County Planning, [West Sussex County Council](#) | Location: Northleigh, County Hall, Chichester,
West Sussex PO19 1RG

Internal: x77623 | External: (01243) 777623 | E-mail: alison.woodfield@westsussex.gov.uk

Think sustainably. Do you have to print? Can you double side? Do you need colour?

...
This e-mail and any attachments are confidential and intended solely for the persons addressed. If it has come to you in error please reply to advise us but you should not read it, copy it, show it to anyone else nor make any other use of its content. West Sussex County Council takes steps to ensure e-mails and attachments are virus-free but you should carry out your own checks before opening any attachment.

✓ Done
B 21/2/13



Peter Cleveland

From: Karl Roberts
Sent: 02 December 2013 16:54
To: Peter Cleveland
Subject: FW: Planning Application for Waste Facility at Ford

Hi, I believe this has been allocated to you.
Please note.

Karl Roberts | Assistant Director of Planning Services & Economic Regeneration, Arun District Council | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
Internal: 37760 | External: +44 (0) 1903 737760 | E-mail: Karl.Roberts@arun.gov.uk

Visit Arun's web site at www.arun.gov.uk



Save the environment - think before you print.

From: Karl Roberts
Sent: 02 December 2013 12:25
To: 'Derek Waller'
Cc: The Mayor; Arundel TC; Paul Dendle
Subject: RE: Planning Application for Waste Facility at Ford

Derek,
Thank you for the e-mail.
We have just received it so I will ensure that your e-mail is brought to the attention of the officer the case is allocated to.
I understand the logic of your request for the condition.
Regards
Karl

Karl Roberts | Assistant Director of Planning Services & Economic Regeneration, Arun District Council | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
Internal: 37760 | External: +44 (0) 1903 737760 | E-mail: Karl.Roberts@arun.gov.uk

Visit Arun's web site at www.arun.gov.uk



Save the environment - think before you print.

From: Derek Waller [REDACTED]
Sent: 02 December 2013 11:49
To: Karl Roberts
Cc: The Mayor; Arundel TC; Paul Dendle
Subject: Planning Application for Waste Facility at Ford

Dear Karl,

A favour please.

The planning application for the new waste facility at Ford has been published by WSCC. The number is WSCC/096/13/F, and all the information is online at

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

I note that ADC is a statutory consultee, and should be grateful if when responding you would please consider asking (insisting on) WSCC for a "condition" which precludes the use of the north (Arundel) end of Ford Road by the HGVs.

You may recall that we suffered when the site was operated by Tarmac because there was no formal (and thus enforceable) routing agreement. What we need - please - is a condition similar to that which applies to the MRF at Ford (which seems to work well).

Can do?

Yours aye,

Derek.

Peter Cleveland

From: Nat Slade
Sent: 13 December 2013 12:22
To: Peter Cleveland
Cc: Graham Evans
Subject: RE: WSCC/096/13/F

Hi Peter,

It is probably also worth noting that when Tarmac were using the site they only used the Ford Road access road. At least in part I am told that this was to prevent the private access road becoming a rat run between Yapton and Ford. It may also attract anti-social driving by "car enthusiasts" which may have noise implications. The applicant should outline the steps they will take to prevent such problems.

Regards,

Nat

From: Nat Slade
Sent: 13 December 2013 11:56
To: Peter Cleveland
Cc: Graham Evans
Subject: WSCC/096/13/F

Peter,

As you are aware Environmental Health have only a relatively short period of time in which to review the substantial volume of information provided within the Environmental Impact Assessment report. I have therefore consulted with our Sussex Air Quality Partnership colleagues on this aspect of the application, and restricted my comments, below, to the potential noise impact. We will provide comment on air quality in due course, but I regret that this will not be possible before the end of the year.

If you have any queries on the comments below, or would like clarification, please do not hesitate to contact me.

Regards,

Nat

Operational Noise

The way that the noise modelling results have been presented, using time averaged sound pressure levels, does not fully represent the disturbance that would be caused from movements of HGVs along the access roads during the daytime. HGV movements are short duration "noise events", but loud and disturbing. This is not fully recognised when reporting results using a time averaged figure. The noise levels and character of these short duration events immediately to the rear of residences has not been fully recognised in the Environmental Statement.

The noise from HGVs or other vehicle movements on the site access roads during the night does not appear to have been modelled at all. The report has not established if the continuous operation of the waste treatment process would necessitate night time movements of HGVs on and off the site, nor if other vehicles would be needed to load hoppers etc during the night, nor has it addressed the impact of these relatively short duration, but potentially disturbing noises. Both access roads pass immediately to the rear of residential premises at Rodney Crescent, Ford to the East, and a number of cul de sacs off Rollaston Park, Yapton, to the West. Further information on the

proposed night time, noise generating activities is needed. Alternatively, I recommend that the County Council by way of conditions prohibit movement of vehicles on the site, other than cars, after 1900 and before 0730.

In addition, the scope of the Environmental Impact Assessment is such that because the additional vehicle movements on local highways is less than 2 % of current volumes, it has been determined by the applicants' consultants that it is not necessary to do any modelling of the additional highway noise. The consultants estimate that there will be 120 HGV movements each day during the operational phase of the proposed development. It should also be recognised that when the site was operated by Tarmac, there was a voluntary agreement that HGV movements before 0800 would only travel on Ford Road south of where the access road joins Ford Road. It is not clear whether any such restriction would be put in place as part of the operation of proposed development. Although the increase of vehicle movements on local highways is estimated to be only marginally increasing (by less than 2%), the noise generated by HGVs is clearly has much more potential for noise disturbance than the equivalent number of cars. Planning and Highway regulatory controls are the only avenues available to reduce this noise impact.

Construction Noise

Whilst disturbance from construction activities are of a temporary nature, in this case the duration of the proposed construction activity is significant at 2 years. In order to protect the amenity of nearby residences during the construction phase, I recommend that the hours of operation during construction should be restricted by condition on planning consent to 0800 – 1800 hours Monday – Friday, and 0800 – 1600 on Saturday. No activities that are audible beyond the site boundary should take place outside of these times.

The figure of 70dB has been used to assess the significance of construction noise. My view is that the figure of 65dB is the appropriate figure to use in accordance with BS5228 Part 1. The applicants may wish to be aware that if a prior consent Control of Pollution Act notice is sought, it is the figure of 65dB which will be used.

Nathaniel Slade | Principal Environmental Health Officer, Arun District Council | Location: Third Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

Internal: 37683 | External: +44 (0) 1903 737683 | E-mail: nat.slade@arun.gov.uk

Visit Arun's web site at www.arun.gov.uk/eh



Save the environment - think before you print.

From: Charlotte Hardy
Sent: 18 December 2013 10:52
To: Peter Cleveland
Subject: Graddon application - F/19/13

Hi

The site is included as an allocated site within the Waste Plan, however there are a number of aspects that they mention which have changed.

As they mention in the application that a relative chunk of the operation will be to deal with residual waste coming from the treatment of material from other facilities. In terms of the overall need for this type of facility, it is largely on the basis of the intention within the Waste Plan for the County to achieve 'net self-sufficiency'. The need they identify in terms of the shortfall in terms of non-inert capacity ranging from 0.47 mtpa as a minimum and 0.61 mtpa in a higher growth scenario. Overall the definition that is within the plan as being 'net self-sufficiency' is for there to be less than 3% of waste arising in the County going to landfill.

Initially at the beginning of the formulation of the Waste Plan a figure of 100,000tpa was allocated for this site, however this increased to 250,000tpa at the later stages and is what is contained within the Plan. Overall this application needs to be judged against the development principles laid out for the site, which are that:

→ where are these principles from??

- Development of the site should be comprehensive
- Comprehensive landscaping scheme required
- Assessment of impact on the listed buildings to the north and possible mitigation required
- If substantial new ground excavations are proposed, low-level archaeological mitigation required
- Assessment of impacts on the water environment (major aquifer) and possible mitigation required
- Assessment of impacts on the amenity of users of public rights of way and possible mitigation and enhancement required
- Assessment of impact (traffic noise, noise, odour) on the amenity of dwellings to the north east and south west and possible mitigation required
- The cumulative impacts of traffic, noise and odour on the environment and local communities to be satisfactorily addressed and mitigated as required, taking into account all existing, permitted, allocated or proposed development within the wider area
- Assessment of the possible closure of the existing access north of Rodney Crescent and the use of an alternative access to the site from Ford Road
- Assessment of impact of additional HGV movements on highway capacity and road safety, including at Church Lane and A259 junction and possible mitigation required
- A routing agreement is required to ensure vehicles enter and exit via Ford Road to the south and not to or from the A27 to the north. Access via Rollaston Park/B2233 for HGVs should also be prevented

However importantly in addition to these aspects the Addendum to the SA that accompanied the most recent consultation on modifications mentioned that there could be concern over the height of the stacks in terms of the proximity to the National Park.

Overall from looking at the application I believe that there may be an issue relating to the proposed height and they could potentially be reduced to 45m without too much of an issue, although I am willing to defer to the comments Nigel (Jenkins) provides on this aspect. Another aspect that I am not certain of from the read through that I did, was exact capacity they are expecting to deal with. They mention a capacity of up to 200,000tpa, although from the figures that they had in terms of the treatment side they were only around 30% or so. As such I think that they need to sort this aspect out, possibly by just making it clearer, although I add the caveat that it was my reading, not necessarily that absolutely not in there I may have missed it.

or applicants

Currently we do not believe that the County has produced enough evidence to show that the potential cumulative impacts on the highway junction and especially in terms of the deliverability of mitigation is certain. We have obviously commissioned MVA to do an Addendum to the Arun Transport Study for Strategic Development to include the proposed Waste Allocations. The County have been included on the Steering Group for this as the highway authority. Specifically this is to investigate the impact of the proposed allocations (in Arun) on the highway network, with a subsequent formulation of a mitigation strategy with specific reference to Hobbs Barn and this site.

Waste Plan or App??

Unfortunately and importantly they have now included a few new paragraphs to say that justification will not be needed for the allocated sites as they should be dealing with the identified shortfall. However, the Waste Plan as whole has not been adopted and potentially if the Inspector is minded taking account of the comments received to the modifications, there will be further Hearing Sessions at the end of Jan. Currently, largely on the basis of the cumulative impact to the A259 junction and also not seemingly having taken account of the outcomes of the SA Addendum we have raised objections to the Plan as it currently stands.

I know that you are not expecting to cover the highway issues in detail as this is something that County should be sorting internally and I cannot remember the exact details but I also think that it would be counter to the last few aspects in terms of going onto Ford Road and preventing access from Rollaston Park.

It may be slightly hard for it all to be included within the application report as there are still a few unanswered questions but hopefully gives more detail. We would in essence be objecting on the basis of the emissions and stack height, plus possibly raising the concern over the highway aspects even if not directly objecting to that aspect.

Charlie

Charlotte Hardy | Senior Environmental Assessment Officer, Planning, Arun District Council | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

Internal: 37794 | External: +44 (0) 1903 737794 | E-mail: Charlotte.Hardy@arun.gov.uk

Visit Arun's web site at www.arun.gov.uk  Save the environment - think before you print.

