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21 January 2014

Our Ref : **F/19/13/**
Your Ref:

Please ask for :
Mr P Cleveland

Dear Sir/Madam,

Proposed development and operation of a waste treatment facility. This is a County Matter and will be determined by West Sussex County Council.
New Circular Technology Park, Former Ford Blockworks, Ford Airfield Industrial Estate, Ford

Thank you for your recent application as above. I am able to inform you that this Authority **objects**.

The officers report and internal consultee responses can viewed on our web site following the link below.

Officers and Members of the Councils Development Control Committee have considered the application details and the Environmental Statement submitted for comment to which an objection is raised by the Local Planning Authority. The reasons for objecting are due to further detail being required in relation to noise emissions, the impact upon the amenity of properties backing onto Rollaston Park, and its impact as well as justification for the stack height.

Noise Impact

The noise modelling results submitted have been presented using time averaged sound pressure levels, the Councils Environmental Health officer has raised concern that this does not adequately represent disturbance caused by HGV's. The statement also fails to establish whether or not the continuous processing of waste necessitates night time movements of HGV's on and off site. Modelling results need to assess this impact, noise created by HGV's are short in duration but are loud and disturbing. The Environmental Statement fails to consider such events, and must consider the short duration noise events upon existing properties in Rodney Crescent and off of Rollaston Park as well as night time activity. Alternatively it is recommended that vehicle movements other than cars and smaller vehicles be restricted after 1930 and 0730 to overcome concerns regarding night time activity.

Construction noise is temporary in nature, however given a 2 year construction time a condition is recommended to restrict hours of work. It is proposed that hours of work will be between 0730 - 1700 Monday to Friday and 0730 - 1600 on Saturdays. It is an officer recommendation that construction works should not commence until 0800, however there is no objection to construction continuing until 1800 Monday to Friday.

Members were also minded to raise objection to the proposed access and egress routes into the site and requested that they be reconsidered. The entry point into the site via Rollaston Park was the principal concern as the increased number of large vehicle movements along this road would have a detrimental impact upon existing properties along the access roads due to increased noise and traffic movements.

Emissions Impact and Stack Height

The detail submitted with the scheme identifies the correlation between the stack height and the impact of emissions from the gasification process on air quality. The modelling process has looked at stack

heights between 30 metres and 70 metres, a stack height of 50 metres has been chosen as at this point the impact when operating at its daily limit the impact is small. Due to the significant visual impact the dual stack system poses, officers recommend that further work should be done to justify the height of the stack. It is thought that it could potentially be reduced to 45 metres as at this point the significance of emissions becomes negligible. Comments are sought from colleagues at the Sussex Air Quality Partnership on this point as a reduction, albeit by 5 metres would lessen the visual impact of the structure.

Should the objection to the scheme not be agreed by WSCC, it is requested that the following conditions be considered.

RECOMMENDED CONDITIONS & INFORMATIVE

1. No construction work/activity that is audible beyond the site boundary shall take place except between the hours of 0800 - 1800 hours Monday to Friday and 0800 - 1600 hours on Saturdays.

Reason: To safeguard the amenities of residents in the locality.

2. Heavy goods vehicle access to and from the site shall be restricted to between 0730 - 1900 hours.

Reason: To safeguard the amenities of residents in the locality.

INFORMATIVE: The figure of 70dB has been used to assess the significance of construction noise. The Districts Environmental Health officers 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.

http://www1.arun.gov.uk/planrec/index.cfm?tpkey=eOcella&user_key_1=F%2F19%2F13%2F&KeyScher

Yours sincerely



Karl Roberts
Assistant Director Planning & Economic Regeneration