

**Recommendation Report for County Matter Consultation**

**REF NO:** F/19/13/

**LOCATION:** New Circular Technology Park  
Former Ford Blockworks  
Ford Airfield Industrial Estate Ford

**PROPOSAL:** Proposed development and operation of a waste treatment facility. This is a County Matter and will be determined by West Sussex County Council.

**SITE AND SURROUNDINGS**

|                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| DESCRIPTION OF APPLICATION  | <p>The application proposes the operation of a reception/pre-treatment waste facility and a Materials Recovery Facility which is to be housed within the existing factory building on the site.</p> <p>A new building on the site is proposed to accommodate a Residual Waste Treatment Facility. This facility would be constructed on the concrete hard-standing immediately south of the existing factory building on the site. The new building would measure 22 metres in height and have a footprint of 120 metres x 70 metres (8400 square metres).</p> <p>A dual flue stack would also project above the building with an overall height of 50 metres. This would also house a combined heat and power unit utilising heat from electricity generation.</p> <p>A new vehicle weighbridge is also proposed at the entrance to the site, adjacent to an existing weighbridge.</p> |
| SITE AREA                   | 5.4 hectares.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| RESIDENTIAL DEVELOPMENT DEN | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| TOPOGRAPHY                  | Predominantly flat.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| TREES                       | None of any significance affected by the proposed development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| BOUNDARY TREATMENT          | Mature conifer screening to north boundary, metal fencing and hedging enclosing the remainder of the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| SITE CHARACTERISTICS        | The application site is located at the new Circular Technology Park, on the former Ford Blockworks land, which was decommissioned in 2010. The existing site is occupied by 2No. existing former aircraft hangers (although these are not included within the red edge of the application site) and aerated block factory building which sits to the south of the existing hangers. These building                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

have an overall height of 16-17 metres. The remaining part of the site is laid to concrete.

**CHARACTER OF LOCALITY**

The site is located on the Ford Airfield Industrial Estate, with access gained from the site via Ford Road to the east and Rollaston Park to the west. Open farmland surrounding the site, wastewater treatment plant beyond to the south. Flying fortress and indoor football facilities to west, with industrial units and residential properties beyond. Residential properties in Rodney Crescent and Ford Lane to the east and north respectively. Some businesses noted along Ford Lane and art studio located along eastern access road from Ford Road.

**RELEVANT SITE HISTORY**

|         |                                                                                                                                                                                                                                                            |                               |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| F/4/07/ | Installation of combined heat and power (CHP) plant units.(This is a County Matter and will be determined by West Sussex County Council)                                                                                                                   | ApprvdCond-WSCC<br>21-05-2007 |
| F/9/10/ | Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for variation of Condition 6 of planning permission F/16/05 (B) to allow sludge deliveries from different sources (This application will be determined by the WSCC) | No Objection<br>11-05-2010    |

**REPRESENTATIONS**

**Representations received:**

**Comments on Representations received:**

**CONSULTATIONS**

Environmental Health  
Parks and Landscapes

**Consultations responses received:**

ENVIRONMENTAL HEALTH:

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 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.

#### **Comments on Consultation responses:**

An informative will be recommended to WSCC regarding the assessment of construction noise requirements to ensure any prior consent application under the Control of Pollution Act meets the required BS5228 Standard as set out above.

#### **POLICY CONTEXT**

Designation applicable to site:  
Outside of the built-up area boundary

#### **DEVELOPMENT PLAN POLICIES**

|                           |                       |                                                               |
|---------------------------|-----------------------|---------------------------------------------------------------|
| Arun District Local Plan: | <a href="#">GEN3</a>  | Protection of the Countryside                                 |
|                           | <a href="#">DEV8</a>  | Circumstances in which Additional Development may be Permit'd |
|                           | <a href="#">GEN32</a> | Noise Pollution                                               |

[GEN34](#)  
[GEN7](#)

Air Pollution  
The Form of New Development

## **PLANNING POLICY GUIDANCE**

NPPF

National Planning Policy Framework

### **POLICY COMMENTARY**

The above policies combine to describe the criteria against which the application will be assessed particularly with regard to visual and residential amenity.

### **DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND**

### **OTHER MATERIAL CONSIDERATIONS**

It is considered that there are no other material considerations to warrant a decision otherwise than in accordance with the Development Plan and/or legislative background.

### **CONCLUSIONS**

This is a County Matter Waste application submitted to West Sussex County Council (WSCC) who will determine the application. The Local Planning Authority is a consultee only for the application and it is not the role of Arun DC to make a decision on the application. It is proposed that the wording below is incorporated into a letter in response to WSCC.

#### **BACKGROUND**

The site is included as an allocated site within the submitted County Waste Local Plan 2013. The proposed waste treatment plant will mainly deal with residual waste coming from the treatment of material from other facilities; however some residual waste will be produced from the on-site Materials Recycling Facility. In terms of the overall need for this type of facility, the application is made on the basis of the intention within the Waste Local Plan for the County to achieve 'net self-sufficiency' and avoid inert waste going to landfill.

#### **HIGHWAY IMPACT AND CAPACITY**

The impact upon the highway network is to be assessed by WSCC Highways Department; access to the site is proposed via Rollaston Park and vehicles exiting will be via Ford Road. This is access routes proposed in this application are contrary to a development principle within County Waste Local Plan 2013 relating to this site which states all access to the site should be via the Ford Road access.

WSCC Highways have confirmed that all HGVs associated with the site will travel southwards from the site along Ford Road, and not northwards to link with the A27. This routing agreement is to be secured by WSCC under a S106 agreement. As such it is not recommended that comments are raised by Arun DC on highways matters other than to support the approach to divert HGVs southwards along Ford Road.

#### **MATERIALS RECOVERY FACILITY PROCESS**

MRFs are specialised plants that receive, separate and prepare recyclable materials for marketing to end-user manufacturers. Once sorted, recyclable materials will be bulked up and baled for onward transportation. Residual materials that cannot be recycled will be directed to the residual

waste treatment facility to be processed.

#### **RESIDUAL WASTE TREATMENT PROCESS**

Residual waste (i.e. waste that cannot be further re-used or recycled) will be treated in the proposed Residual Waste Treatment Facility, and converted into energy in the form of electricity and heat. The process used by the facility will be gasification which involves heating waste to a high temperature within a sealed compartment which causes the waste to breakdown into syngas. When this gas is combusted it gives off a significant amount of heat that can then be utilised.

The process does result in emissions from the treatment process by air pollution control residues and residue ash from the combustion process. The ash is not hazardous and can be recycled and used as aggregate replacement, approximately 21,000 tonnes of residue ash (15% of the input) will be generated each year and transfers off-site. Air pollution residues are filtered to and stored in silos and transferred off-site to be used for construction block manufacture, approximately 7,000 tonnes of air pollution control ash will be generated annually (5% of the input).

#### **OFFICER RECOMMENDATION**

Officers have considered the application details and the Environmental Statement submitted for comment and it is recommended that an objection be raised by the Local Planning Authority. The reasons for objecting is due to further detail being required in relation to noise emissions 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.

##### **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.

#### **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.

#### **RECOMMENDATION**

#### **OBJECTION**

- 1 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.

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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.

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

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