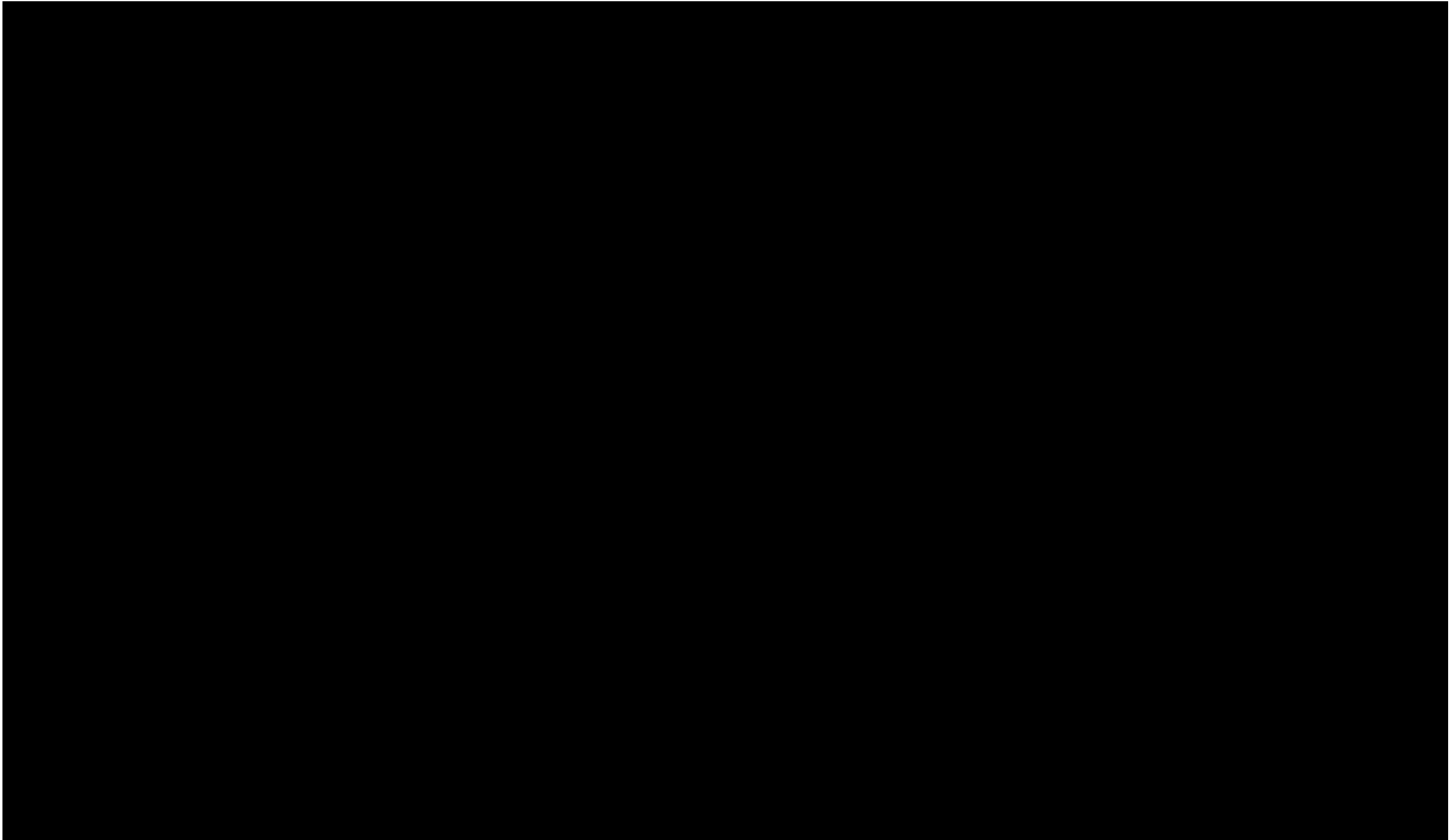




From: Fiona Fitzgerald <Fiona.Fitzgerald@arun.gov.uk>
Sent: 08 July 2020 16:33
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Raymond Cole <Raymond.Cole@arun.gov.uk>; Neil Williamson <Neil.Williamson@arun.gov.uk>
Subject: FW: F/4/20/OUT

Dear Planning,

Environmental Health **objects** to this application on the basis of noise and odour.

Odour Comments

1. Whilst the odour assessment takes into account the Southern Water WWTW, it does not appear to take account of any future increase in capacity given the current scale of development within the District. Any future increase in capacity would have a subsequent impact on the results of the odour assessment, given that it is proposed that residential uses are placed in reasonably close proximity to the WWTW.
2. The air quality and odour assessment has not taken into account the proximity of the biogas digester and lagoon at the Wicks Farm site and any odour impact on potential new residential uses. When Planning Permission from WSCC for the Wicks Farm (biogas digester) site was granted, there were a limited number of residential dwellings close by. This application looks to place a residential use across the road from the biogas digester and lagoon.
3. Odour from the Wicks Farm unit also has not been taken into account of in terms of cumulative impact of the entire development.
4. Further, there is a business smoking foodstuffs on Ford Lane (B1, Ford Airfield, BN18 0HY) which has not been considered in terms of odour impact on future residents of the proposed development. Whilst this unit is to the north-east of the proposed site and a Statutory Nuisance has not yet been substantiated, this Authority has received complaints regarding odour and smoke from this premises. The potential impact of odour from this unit has not been considered within the application, either in specific terms or cumulative terms.

5. The odour assessment has not taken account of any potential odour from Grundon Waste Management Transfer Station. Paragraph 11.58 of the Odour and Air Quality section of the EIA states “it has been assumed that the facility is operating in line with its permit and any odour associated with the operations is managed by this permit. Odour impacts from the Grundon WTS have therefore not been considered further within this ES”. However, the planning permission given for this site, and any conditions on this or the permit will relate to the impact on residential premises as they are at present. They clearly will not take account of the impact on any proposed new residential premises. Environmental Health therefore consider that potential odour impacts from the Grundon WTS must be taken into account in this application.
6. Cumulative odour impacts from Grundon WTS have therefore also not been considered.

Noise

1. In respect of the acoustic report (Technical Report R6930-3 Rev 2, para 3.15) states that recent case history of a difference between background and rating noise level of + 10 dB is acceptable – Environmental Health does not support a rating noise level of this magnitude (in line with the Planning Noise Advice Document Sussex July 2015).
2. Paragraph 12.44 of the Noise and Vibration chapter of the EIA. Please can the applicant confirm whether the HM Prison Ford was taken into account as a noise sensitive receptor as they do not appear to be listed as one of the receptors in this paragraph.
3. Paragraph 12.56 – whilst Environmental Health agree that the construction activities are not permanent, the site will be under construction for approximately 10 years and therefore they might not be considered to be temporary either, particularly to the current local residents.
4. Environmental Health would wish to place a number of conditions relating to noise if permission was given– these could be discussed at a further stage, but would include common conditions relating to construction times, control of commercial noises (e.g. fans from commercial uses affecting flats above), separation of flats above commercial use etc).
5. With reference to the acoustic report Technical Report R6930-3 Rev 2, could the applicant please confirm whether or not the impact of noise from Rudford Industrial Estate was considered. Location 7 would appear to be appropriate for this noise source.
6. Paragraphs 4.11 to 4.16 detail what the daytime noise levels were affected by but do not mention what the night-time noises were affected by. Please could the applicant provide information on the types of noises that impacted each noise location at night-time?
7. Paragraph 5.15 states “it should be noted that some dwellings will require closed windows to achieve suitable internal noise levels”. Please could the applicant provide further information on how many dwellings this is likely to apply to and their likely location?
8. 5.27 of the acoustic report states that the permitted hours for HD Whist are 07.00 – 18.00 Monday to Friday and 07.00-12.00 Saturdays and that on this basis the noise impact will be limited to daytime hours only. Please could the applicant confirm whether other businesses on site have night-time hours and whether these need to be taken into account during the assessment?
9. It would appear that any future development of the Grundon site has not been taken into account as there would then be uncertainty as to whether the current acoustic report provides sufficient information for a decision to be taken.

Air Quality and Dust Comments

Environmental Health strongly agrees that a Dust Management Plan, secured by condition, would be appropriate in this case. Similarly, Environmental Health also agrees that a CEMP be submitted, also secured by condition.

Conditions

Should Planning Permission be given for this application, Environmental Health would request that the following conditions be placed on any permission:

1. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:-
 - a) An indicative programme for carrying out of the works;
 - b) Details of the arrangements for public engagement / consultation both prior to and continued liaison during the construction works;
 - c) Measures to minimise the noise (including vibration) generated by the construction process to include hours of work, proposed method of piling for foundations, the careful selection of plant and machinery and use of noise mitigation barrier(s);
 - d) Details of any floodlighting, including location, height, type and direction of light sources and intensity of illumination;
 - e) The parking of vehicles of site operatives and visitors;
 - f) Loading and unloading of plant and materials, including permitted times for deliveries;
 - g) Storage of plant and materials used in constructing the development;
 - h) The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - i) The provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulations Orders);
 - j) Measures to control the emission of dust and dirt during construction;
 - k) A scheme for recycling / disposing of waste resulting from demolition and construction works i.e. no burning permitted.

Reason: To protect the amenity of local residents in accordance with Policy QE SP1 of the Adopted Arun Local Plan 2011 – 2031

2. No development shall take place, including any works of demolition, until a Dust Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period.

Reason: To protect the amenity of local residents in accordance with Policy QE SP1 of the Adopted Arun Local Plan 2011 – 2031

3. No construction / demolition activities shall take place, other than between 08:00 to 18:00 hours (Monday to Friday) and 08:00 to 13:00 hours (Saturday) with no 'noisy' work on Sunday or Bank Holidays

Notes: the words in square brackets may be adjusted to reflect site specific constraints

Reason: To protect the amenity of local residents in accordance with Policy QE SP1 of the Adopted Arun Local Plan 2011 – 2031

4. Prior to commencement of the development hereby approved (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme 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:
 - a. A 'Preliminary Risk Assessment' which has identified: all previous (historical) uses; potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors; and potentially unacceptable risks arising from contamination at the site.
 - b. A 'Site Investigation Scheme', based on (1) above to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
 - c. Based on the 'Site Investigation Scheme' and the detailed risk assessment (2), an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

- d. A 'Verification Report' providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Note: Any changes to these components, (1) to (4) require the express written consent of the Local Planning Authority.

The scheme shall be implemented as approved above and, prior to commencement of any construction work (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), a Verification Report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of that 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. The report shall also include 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 report, and for the reporting of this in writing to the Local Planning Authority.

Reason: To protect the amenity of local residents in accordance with Policy QE DM4 of the Adopted Arun Local Plan 2011 – 2031.

5. The owner(s) of any commercial property (warehouses, offices, etc.) built before 2000 are legally obliged to hold a copy of an asbestos register for each property in their portfolio. As the proposed development is being renovated to residential, the Council need to be satisfied that if any asbestos previously identified is still present, it is either removed or suitably managed to minimise risk to human health as there is no safe threshold for asbestos exposure. A copy of the asbestos register, and any remedial strategy (where appropriate), must be provided in writing to the Local Planning Authority prior to any works commencing.

Reason: To protect the amenity of local residents in accordance with Policy QE DM4 of the Adopted Arun Local Plan 2011 – 2031.

6. Environmental Health would also require a lighting condition based on the ILP guidance.

Regards

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Environmental Health

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