
Ford Airfield Market Waste Infrastructure Statement

On behalf of Redrow Homes Southern Counties and Wates Developments Limited

February 2021

Ford Airfield Market

Waste Infrastructure Statement

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1.0 Introduction

1.1 This Waste Infrastructure Statement has been prepared on behalf of Redrow Homes Southern Counties and Wates Developments Limited further to the submission of planning application F/5/20/PL for reconfiguration of the Ford Market.

1.2 The description of development is as follows:

Reconfiguration of Ford Market, including revised market access, hardstanding for replacement vehicular parking and associated infrastructure, landscape, ancillary and site preparation works

1.3 This Statement is submitted in accordance with Policy W2 'Safeguarding Waste Management Sites and Infrastructure' of the West Sussex Waste Local Plan (April 2014) and the associated Mineral and Waste Safeguarding Guidance (October 2019).

1.4 It demonstrates how the proposals can be successfully delivered without preventing or prejudicing the operations of existing and consented/extant waste facilities.

2.0 Background

2.1 The West Sussex Mineral and Waste Safeguarding Guidance explains that Waste Consultation Areas exist around all safeguarded Waste Infrastructure. Appendix E of the Guidance provides the Consultation Area Maps by Local Authority Area, including Arun District.

2.2 The application site falls within multiple Waste Infrastructure Consultation Areas. West Sussex County Council (WSCC) has confirmed that these relate to the following waste facilities, which should be considered in this Statement:

- 1) H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site, operated by H D White.
- 2) New Circular Technology Park, Ford – Materials Recycling Facility, operated by Grondon Waste Management Ltd.
- 3) Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment Facility, operated by Southern Water.
- 4) South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility, operated by South Coast Skips Ltd.
- 5) Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility, operated by Viridor.

Planning context

Planning history

2.3 The application site has been established as a market, with planning permissions which have secured the use and the operating hours of the market as below:

MARKET DAY	REFERENCE NUMBER	DESCRIPTION OF DEVELOPMENT	PERMITTED OPERATIONS	DECISION
Thursday	F/10/01	Use of market for Thursday car boot sales	Car boot sales	Approved: 17/10/2007
Saturday	F/12/10	Variation of Condition No 1 imposed on planning permission F/10/01 to permit the operation of a Farmers' Market. Substitution of Condition No 10 to read 'No vehicles shall enter the site before 07.30 hours and all vehicles shall be removed from the site by 11.30 hours on the same day'	Car boot sales and farmers' market	Approved: 03/04/2012
Sunday	F/14/12	Renewal of temp. permission F/12/10 for continuance of use without Conditions 3 & 4 imposed on F/12/10 and the imposition of a new Cond 3 'No stallholder vehicles shall enter the site prior to 07.30hrs and the erection of stalls shall be completed by 09.30hrs. All stalls shall be dismantled and removed from the site by 10.30hrs on the same day'	Car boot sales / retail market	Approved: 23/08/2015

- 2.4 It is relevant to the consideration of the proposal that the principle of a market has already been established. The proposals involve only a minor reconfiguration to the way in which the Market will operate, and will have the same visitor capacity and trading as currently exists. Therefore, there is an existing relationship between the market and neighbouring waste allocation sites which is material to the consideration of the application.
- 2.5 Furthermore, it is relevant that at the time of determination of the extant scheme at the Circular Technology Park under WSCC/096/13/F, the relationship with the existing market will have been assessed and considered acceptable.

Arun Local Plan

- 2.6 Ford Airfield is allocated for development via Policy H SP2c (part SD8) of the Arun District Local Plan 2011-2031, which was formally adopted by ADC in July 2018. The site is also allocated via Policy SA1 of the made Ford Parish Council Neighbourhood Development Plan 2017-2031 (January 2019).
- 2.7 The site is allocated in both Plans for a residential-led mixed-use development involving up to 1,500 new homes, employment, a community hub comprising retail / commercial and community uses, primary school, nursery and associated development.
- 2.8 These allocations clearly establish the 'in principle' acceptability of residential-led mixed-use development at the site. The allocations were made in full knowledge and understanding of the existing safeguarded sites and were consulted upon widely.
- 2.9 The proposals at Ford Airfield Market are necessary to facilitate the delivery of the allocated site.

Waste Local Plan

- 2.10 The Waste Local Plan was adopted in 2014. Policy W2 (Safeguarding Waste Management Sites and Infrastructure) states the following:

Development that would prevent or prejudice the use of existing waste management sites or infrastructure that make an important contribution to the transfer of waste will not be permitted unless:

- (a) the current use is temporary and the site or infrastructure is unsuitable for continued waste use;*
- (b) continued use of the site or infrastructure for waste management purposes would be unacceptable in terms of its impact on local communities and/or the environment;*
- (c) redevelopment of the site or loss of the infrastructure would form part of a strategy or scheme that has wider social and/or economic benefits that clearly outweigh the retention of the site or the infrastructure for waste use; or*
- (d) a suitable replacement site or infrastructure has been identified and permitted.*

2.11 Policy W10 (Strategic Waste Allocations) of the West Sussex Waste Local Plan allocates the Site north of Wastewater Treatment Works at Ford. Criterion d of Policy W10 state the following:

(d) The sites allocated under (a)-(b) will be safeguarded from any development either on or adjoining the sites that would prevent or prejudice their development (in whole or in part) for the allocated waste management use or uses.'

National Planning Policy for Waste (NPPW)

2.12 Paragraph 8 of the NPPW states:

When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- *the likely impact of proposed, non-waste related development on **existing waste management facilities, and on sites and areas allocated for waste management**, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;*

National Planning Policy Framework (NPPF 2019)

2.13 Paragraph 183 of the National Planning Policy Framework (NPPF) states:

*The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). **Planning decisions should assume that these regimes will operate effectively.** Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.*

Policy context summary

- 2.14 Overall, the local planning policy context seeks that any development demonstrate there would be no harm or prejudice to the operation of existing and allocated waste facilities and infrastructure. **As set out in an email from Karl Roberts on 11 September 2020, it is only necessary for the proposed development to consider the relationship with existing or consented (and extant) schemes.**
- 2.15 Therefore, to accord with the safeguarding policy of waste sites it is not necessary, reasonable or appropriate for proposals to consider potential unconsented operations as there is no guarantee they will receive permission either in the form submitted or any other form.
- 2.16 Therefore, of the facilities set out in paragraph 2.2, the Statement will consider both existing operations as well as consented and extant schemes. For avoidance of doubt, together with existing operations, the consented and extant schemes that, as far as we are aware have not been built out in full, include the following permissions:
- WSCC/096/13/F: Circular Technology Park
 - WSCC/027/18/F: Circular Technology Park
- 2.17 In addition, the NPPF 2019 (paragraph 183) is clear that where environmental permitting is in place, planning decisions should not seek the control of processes/emissions where these are already subject to separate pollution control regimes, and importantly should assume these regimes will operate effectively. It is clear therefore, that where an environmental permit exists for existing operations, the planning decision should assume that the facility is operating in compliance with the conditions of that permit.

West Sussex Mineral and Waste Safeguarding Guidance

- 2.18 Paragraph 3.3. of the Guidance document explains that:

"The need for the proposed development will be weighed against the need to retain the minerals and/or safeguarded site and the relevant criteria in Policy M10 of the JMLP and Policy W2 of the WLP. For proximate development, consideration will be given to whether it can proceed without compromising the ability of the site to operate effectively or whether mitigation would reduce the sensitivity of the development to an acceptable level, in accordance with the 'agent of change' principle."

2.19 Information that allows the Waste Planning Authority and Local Planning Authority to make this assessment should be provided and should address matters including:

- A. "The distance of the proposal from the safeguarded site;*
- B. Any existing screening from buildings or vegetation;*
- C. Identification of pre-existing conditions such as background noise, light, odours, vibration, dust and other emissions;*
- D. The potential for the site to deliver suitable mitigation including the identification of the means by which the development has introduced layout, design and other mitigation measures to mitigate potential effect on and from the safeguarded site;*
- E. Confirmation of pre-application consultation/engagement with the minerals or waste infrastructure operator (to demonstrate a full understanding of the existing and potential future operation of the site, including hours of operation, level of activity and likely sources of noise, light, odours, vibration, dust and other emissions);*
- F. Where appropriate, a full assessment of issues such as noise and light;*
- G. Statement of the overall compatibility of the development with the minerals or waste infrastructure."*

2.20 The remainder of this Statement responds to each of the requirements of the Guidance document in turn with reference to each safeguarded site.

3.0 Conformity with WSCC guidance document

- 3.1. As set out in paragraph 2.19 above, this section assesses the proposal against the criteria contained in paragraph 3.3 of the West Sussex Mineral and Waste Safeguarding Guidance.

A. The distance of the proposal from the safeguarded site

- 3.2. Table 1 sets out the distance between the proposal and the identified safeguarded sites, identified on Figure 1.

Table 1: Distance between safeguarded site and nearest part of proposals		
	Safeguarded site	Based on Proposed Site Plan, distance to closest part of the proposal (shown in brackets)
1	H D White, Ford Industrial Estate, Ford Scrap Metal Recycling Site Operated by H D White	256m (southern part of the northern runway)
2	New Circular Technology Park, Ford Materials Recycling Facility Operated by Grundon Waste Management Ltd	24m (the proposed overflow car park)
3	Ford Wastewater Treatment Works, Ford Aerodrome, Ford Wastewater Treatment Facility Operated by Southern Water	17m (the proposed overflow car park)
4	South Coast Skips, Rudford Industrial Estate, Ford Waste Transfer Site and Aggregate Recycling Facility Operated by South Coast Skips Ltd	233m (the southern runway)
5	Ford MRF, Ford Airfield, Ford Road, Yapton Materials Recycling Facility Operated by Viridor	14m (the southern runway)

- 3.3. As set out previously, the market is an existing use on the site. Therefore, the relationship between the operation of the market and the neighbouring waste sites is existing, and the capacity of the market would remain as existing. A new overflow car park and access would be provided in proximity to the Circular Technology Park and Ford Wastewater Treatment Works. However, as set out below the relationship between the car park and these facilities would be acceptable given their proposed use and configuration.

B. Any existing screening from buildings or vegetation

- 3.4. Table 2 sets out the existing screening of the safeguarded site in relation to the Ford Market proposal:

Table 2: Screening of safeguarded site		
	Safeguarded site	Existing screening
1	H D White, Ford Industrial Estate, Ford Scrap Metal Recycling Site Operated by H D White	The safeguarded site benefits from existing screening from vegetation around its eastern boundary.
2	New Circular Technology Park, Ford Materials Recycling Facility Operated by Grundon Waste Management Ltd	The safeguarded site benefits from existing screening from vegetation around its northern, eastern and western boundaries.
3	Ford Wastewater Treatment Works, Ford Aerodrome, Ford Wastewater Treatment Facility Operated by Southern Water	The safeguarded site benefits from existing screening from vegetation around its perimeter.
4	South Coast Skips, Rudford Industrial Estate, Ford Waste Transfer Site and Aggregate Recycling Facility Operated by South Coast Skips Ltd	The safeguarded site benefits from existing screening from vegetation around its eastern boundary.
5	Ford MRF, Ford Airfield, Ford Road, Yapton Materials Recycling Facility Operated by Viridor	The safeguarded site benefits from existing screening from vegetation around its perimeter.

- 3.5. As above, the safeguarded sites have existing screening. There is no change to the existing relationship between the market and safeguarded sites in relation to the location of market trading. There is considered to be no visual/screening impacts on the proposed car park or access, given their intended purpose.

C. Identification of pre-existing conditions such as background noise, light, odours, vibration, dust and other emissions

1) *H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site
Operated by H D White*

- 3.6. We are aware of operational noise associated with processes and vehicles entering / leaving the industrial estate. Given the current operations of the market in closest proximity to HD White would be relocated, the proposal would not result in any additional impact to the safeguarded site than the existing market operations.

2) *New Circular Technology Park, Ford – Materials Recycling Facility
Operated by Grundon Waste Management Ltd*

- 3.7. Based on conversations with local residents during a public exhibition held in January 2020 ahead of submission of the Outline planning application, we understand that locals have experienced significant odour on an ongoing basis from the existing Grundon facility.
- 3.8. It is understood that odour arises from the doors to the facility being left open during operations, resulting in odour not being contained, while waste is often discarded outside the buildings, attracting seagulls and rats in the process. This conflicts with the requirements set out within Grundon's permit, as provided at **Appendix 1**, which explains at paragraph 3.2.1 that:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable, to minimise, the odour."

- 3.9. We understand that Grundon does not have an odour or environmental management plan in place at present.
- 3.10. The noise emitting from the current operations are also controlled under the Environmental Permit.
- 3.11. Under the extant consent WSCC/096/13/F, noise and odour conditions have been secured which would require the future facility to operate under negative pressure with the doors shut as far as reasonably practicable and restrict the hours of operations. An additional consent has been implemented for a new access under WSCC/027/18/F.
- 3.12. As previously discussed, the market operates on the site under existing planning consents and the trading area for the market will not change. The above consented waste uses post-dated the consents for the market on the site, and would have taken consideration of their relationship at that time. Therefore the relationship of the market trading area to the safeguarded site and both existing and consented operations will not change.

3) *Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment
Facility
Operated by Southern Water*

3.13. We are aware that the safeguarded site releases odour due to the nature of the material handled on site. We understand that the level of odour varies depending on the time of day, meteorological conditions, wind speed / direction and maintenance / operational factors.

3.14. The proposal would not result in any market trading in closer proximity than the existing consents and therefore the relationship of the market trading area to the safeguarded site will remain as consented.

*4) South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility
Operated by South Coast Skips Ltd*

3.15. There are no known pre-existing conditions of these sites which affect the proposals at Ford Airfield Market.

*5) Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility
Operated by Viridor*

3.16. We are aware of operational noise associated with the emptying of glass and materials, vehicle horns, reversing alarms and noise from plant and processing. The facility does not handle odorous materials.

D. The potential for the site to deliver suitable mitigation including the identification of the means by which the development has introduced layout, design and other mitigation measures to mitigate potential effect on and from the safeguarded site

*1) H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site
Operated by H D White*

*4) South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility
Operated by South Coast Skips Ltd*

3.17. As explained above, the Market has operated at Ford Airfield for a number of years alongside these safeguarded sites. It is an existing use that will largely continue to operate in the same location. The Market proposals ensure that it has the same trading and visitor capacity as its current operation. Given the nature of the proposals, it is not considered that the safeguarded site would be adversely affected, and mitigation is therefore not required.

- 2) *New Circular Technology Park, Ford – Materials Recycling Facility
Operated by Grundon Waste Management Ltd*
- 3) *Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment
Facility
Operated by Southern Water*
- 5) *Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility
Operated by Viridor*

- 3.18. As explained above, the Market has operated at Ford Airfield for a number of years alongside these safeguarded sites. It is an existing use that will largely continue to operate in the same location. The Market proposals ensure that it has the same trading and visitor capacity as its current operation. Given the nature of the proposals for the trading area remain as per the current consents, it is not considered that the safeguarded site would be adversely affected, and mitigation is therefore not required.
- 3.19. The proposal would result in a new overflow car park and access/egress to the market site that would use the same access as these safeguarded sites, from Ford Road.
- 3.20. In this regard, a Transport Assessment has been submitted to support the application which details in full the assessments that have been made to include the proposed scheme and the existing and extant planning permissions for the Circular Technology Park. This has been summarised in a Technical Note that is appended in **Appendix 2** to this Statement.
- 3.21. The Technical Note confirms that due to the proposed orientation and layout of the access/egress, the timings of operations proposed and the priority that is afforded from the Highway Code, the proposed access/egress and overflow car park would not prejudice the operation or movement of HGVs/traffic from the existing or consented schemes at the Circular Technology Park.
- 3.22. Furthermore, the Technical Note confirms that in the assessment of traffic generation, this has accounted for both existing operations together with that anticipated from the extant scheme under WSCC/027/18/F and WSCC/096/13/F.
- 3.23. Lastly, West Sussex Highway Authority has reviewed the application and raised no objection to the scheme on highway grounds.
- 3.24. Therefore, on the basis of the evidence provided, no mitigation will be required.

E. Confirmation of pre-application consultation/engagement with the minerals or waste infrastructure operator (to demonstrate a full understanding of the existing and potential future operation of the site, including hours of operation, level of activity and likely sources of noise, light, odours, vibration, dust and other emissions)

*1) H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site
Operated by H D White*

*3) Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment Facility
Operated by Southern Water*

*4) South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility
Operated by South Coast Skips Ltd*

*5) Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility
Operated by Viridor*

3.25. As part of the pre-application process, engagement has taken place with a range of local stakeholders. Invitations to engagement and consultation events have been sent to every resident and business within Ford parish, alongside others likely to be affected by the proposals. The operators of the safeguarded site have not raised any concerns regarding the proposals.

*2) New Circular Technology Park, Ford – Materials Recycling Facility
Operated by Grundon Waste Management Ltd*

3.26. As part of the pre-application process, engagement has taken place with Grundon, the current operator of the safeguarded site. A full review of the planning permissions at the site, alongside the respective planning conditions and permit, has taken place.

3.27. Further to this, we are aware that an EIA Scoping Report has been submitted by Ford EfW Ltd – a joint venture between Grundon Waste Management Limited and Viridor – to West Sussex County Council (WSCC) in connection with their proposals for the development of an Energy Recovery Facility (ERF) and Waste Transfer Station (WTS) at the safeguarded site. We have also met with Grundon and Viridor to discuss our respective proposals.

3.28. The Market proposals ensure that it has the same trading and visitor capacity as its current operation. Given the nature of the proposals, it is not considered that the existing or proposed waste uses would be adversely affected.

F. Where appropriate, a full assessment of issues such as noise and light

- 1) H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site
Operated by H D White*
- 2) New Circular Technology Park, Ford – Materials Recycling Facility
Operated by Grundon Waste Management Ltd*
- 3) Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment Facility
Operated by Southern Water*
- 4) South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility
Operated by South Coast Skips Ltd*
- 5) Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility
Operated by Viridor*

3.29. It is not considered that an assessment of noise or light issues is necessary. Market operations will continue as existing and no lighting is proposed through the application.

G. Statement of the overall compatibility of the development with the minerals or waste infrastructure

- 1) H D White, Ford Industrial Estate, Ford – Scrap Metal Recycling Site
Operated by H D White*
- 2) New Circular Technology Park, Ford – Materials Recycling Facility
Operated by Grundon Waste Management Ltd*
- 3) Ford Waste Water Treatment Works, Ford Aerodrome, Ford – Waste Water Treatment Facility
Operated by Southern Water*
- 4) South Coast Skips, Rudford Industrial Estate, Ford – Waste Transfer Site and Aggregate Recycling Facility
Operated by South Coast Skips Ltd*
- 5) Ford MRF, Ford Airfield, Ford Road, Yapton – Materials Recycling Facility
Operated by Viridor*

3.30. Overall, as demonstrated throughout this Statement, the proposed development can proceed without compromising the ability of the safeguarded sites to operate effectively. On the basis of the existing market at the site and the evidence provided to support the application, the proposed development is entirely compatible with the safeguarded sites.

4.0 Conclusions

- 4.1 It is a material consideration that there is an existing market use on the site. The proposal seeks to reconfigure the existing market to allow for access to the east, from Ford Road, together with a new overflow car park.
- 4.2 The above assessment has demonstrated that the proposal would maintain the current market trading areas and therefore, there would be no change to the existing relationship of the market and surrounding safeguarded sites (both existing and consented).
- 4.3 The proposed access and overflow car park to the east has been assessed against the operations and vehicle movements from the safeguarded sites, including the extant Circular Technology Park scheme. The appended Highways Technical Note confirms that the proposal would not prejudice the operation of these facilities.
- 4.4 Therefore, the proposed development is considered to be entirely compatible with all existing waste facilities, in line with the adopted Arun District Local Plan, Ford Neighbourhood Plan and West Sussex Waste Local Plan.
- 4.5 Full details and justification are provided in the submitted Planning, Design and Access Statement and Transport Assessment.

APPENDIX 1: GRUNDONS ENVIRONMENTAL PERMIT

**LIT 6956
SR2008 NO3
_75KTE -
HOUSEHOLD
COMMERCIAL
AND
INDUSTRIAL
WASTE
TRANSFER
STATION WITH
TREATMENT** Stan
dard rules



Chapter 4, The Environmental Permitting
(England and Wales) Regulations 2010

Standard rules SR2008 No3 75kte - household, commercial and industrial waste transfer station with treatment – existing permits

Introductory note

This introductory note does not form part of these standard rules.

These standard rules are only available for existing SR2008No3 permit-holders. New applicants should use standard rules SR2015 No6.

When referred to in an environmental permit, these rules will allow the operator to operate a Household, Commercial and Industrial Waste Transfer Station with waste treatment at a specified location, provided that the permitted activities are not carried out within 500 metres of a European Site¹, Ramsar site or a Site of Special Scientific Interest (SSSI); or within 50m of any well, spring or borehole used for the supply of water for human consumption. This must include private water supplies. Furthermore, specified waste cannot be treated outside a building within a specified Air Quality Management Area (AQMA)².

Permitted wastes are limited to non-hazardous wastes and do not include hazardous wastes such as asbestos. The total quantity of waste that can be accepted at a site under these rules must be less than 75,000 tonnes a year. With the exception of specified waste, all bulking, transfer or treatment of non-hazardous waste must be carried out inside a building. Wastes can be bulked up for disposal or recovery elsewhere and can also be treated by sorting, separation, screening, baling, shredding, crushing and compaction. These rules will not permit the burning of any wastes, either in the open, inside buildings or in any form of incinerator.

These rules do not allow any point source emission into surface waters or groundwater. However, under the emissions of substances not controlled by emission limits rule:

- Liquids may be discharged into a sewer subject to a consent issued by the local water company.
- Liquids may be taken off-site in a tanker for disposal or recovery.
- Clean surface water from roofs, or from areas of the site that are not being used in connection with storing and treating waste, may be discharged directly to surface waters, or to groundwater by seepage through the soil via a soakaway.

This permit allows waste recovery activities. Please note that any processed materials will continue to be regulated as waste until they meet the end of waste test in accordance with Article 6 of Directive 2008/98/EC. You can demonstrate that you have met the end of waste tests by either:

- meeting all the criteria set out in any relevant and applicable EU End of Waste regulations; or
- a case by case assessment taking into account the applicable case law, which includes meeting all the requirements of a relevant and applicable Quality Protocol or Defined Industry Code of Practice (e.g. CL:AIRE Development Industry CoP).

End of Introductory Note

¹ A candidate or Special Area of Conservation (cSAC or SAC) and proposed or Special Protection Area (pSPA or SPA) in England and Wales.

²An Air Quality Management Area which has been designated due to concerns about particulate matter in the form of PM₁₀.

Rules

1 – Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
 - (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with rule 1.1.1 shall be maintained.
- 1.1.3 Any persons having duties that are or may be affected by the matters set out in these standard rules shall have convenient access to a copy of them kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

2 – Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in table 2.1 below ("activities").

Table 2.1 activities	
Description of activities	Limits of activities
D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced) R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) D14: Repackaging prior to submission to any of the operations numbered D1 to 13 D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12 R3: Recycling/reclamation of organic substances which are not used as solvents R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials	Treatment consisting only of manual sorting, separation, screening, baling, shredding, crushing or compaction of waste into different components for disposal, (no more than 50 tonnes per day) or recovery. No more than a total of 50 tonnes of intact and shredded waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site.

2.2 Waste acceptance

2.2.1 Waste shall only be accepted if:

- it is of a type and quantity listed in table 2.2 below; and
- it conforms to the description in the documentation supplied by the producer and holder; and
- any excavated soil from known or suspected contaminated sites (established as a result of visual inspection or from knowledge of the origin of the waste) is accompanied by prior chemical analysis establishing the type and degree of contamination.

Table 2.2. Waste types and quantities	
Maximum Quantities The total quantity of waste accepted at the site shall be less than 75,000 tonnes a year.	
Exclusions Wastes having any of the following characteristics shall not be accepted: - Consisting solely or mainly of dusts, powders or loose fibres - Wastes that are in a form which is either sludge or liquid	
Waste Code	Description

Table 2.2. Waste types and quantities	
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 01	wastes from mineral excavation
01 01 01	wastes from mineral metalliferous excavation
01 01 02	wastes from mineral non-metalliferous excavation
01 03	wastes from physical and chemical processing of metalliferous minerals
01 03 06	tailings other than those mentioned in 01 03 04 and 01 03 05
01 03 09	red mud from alumina production other than the wastes mentioned in 01 03 07
01 04	wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
01 04 11	wastes from potash and rock salt processing other than those mentioned in 01 04 07
01 04 12	tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11
01 04 13	wastes from stone cutting and sawing other than those mentioned in 01 04 07
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 03	plant-tissue waste
02 01 04	waste plastics (except packaging)
02 01 07	wastes from forestry
02 01 10	waste metal
02 02	wastes from the preparation and processing of meat, fish and other foods of animal origin
02 02 03	materials unsuitable for consumption or processing
02 03	wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation
02 03 04	materials unsuitable for consumption or processing
02 04	wastes from sugar processing
02 04 01	soil from cleaning and washing beet
02 04 02	off-specification calcium carbonate
02 05	wastes from the dairy products industry
02 05 01	materials unsuitable for consumption or processing
02 06	wastes from the baking and confectionery industry
02 06 01	materials unsuitable for consumption or processing
02 06 02	wastes from preserving agents
02 07	wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)
02 07 01	wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	wastes from spirits distillation
02 07 04	materials unsuitable for consumption or processing
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04

03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
03 03 07	mechanically separated rejects from pulping of waste paper and cardboard
03 03 08	wastes from sorting of paper and cardboard destined for recycling
03 03 10	Fibre rejects, fibre-, filler- and coating-sludges from mechanical separation
04	WASTES FROM THE LEATHER, FUR AND TEXTILE INDUSTRIES
04 01	Wastes from the leather and fur industry
04 01 08	waste tanned leather (blue sheetings, shavings, cuttings, buffing dust) containing chromium
04 01 09	wastes from dressing and finishing
04 02	wastes from the textile industry
04 02 21	wastes from unprocessed textile fibres
04 02 22	wastes from processed textile fibres
06	WASTES FROM INORGANIC CHEMICAL PROCESSES
06 09	wastes from the MSFU of phosphorous chemicals and phosphorous chemical processes
06 09 02	phosphorous slag
06 09 04	calcium-based reaction wastes other than those mentioned in 06 09 03
06 11	wastes from the manufacture of inorganic pigments and opacifiers
06 11 01	calcium-based reaction wastes from titanium dioxide production
07	WASTES FROM ORGANIC CHEMICAL PROCESSES
07 02	wastes from the MFSU of plastics, synthetic rubber and man-made fibres
07 02 13	waste plastic
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	wastes from the photographic industry
09 01 07	photographic film and paper containing silver or silver compounds
09 01 08	photographic film and paper free of silver or silver compounds
09 01 10	single-use cameras without batteries
09 01 12	single-use cameras containing batteries other than those mentioned in 09 01 11
10	WASTES FROM THERMAL PROCESSES
10 01	wastes from power stations and other combustion plants (except 19)
10 01 01	bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
10 01 05	calcium-based reaction wastes from flue-gas desulphurisation in solid form
10 01 07	calcium-based reaction wastes from flue-gas desulphurisation in sludge form
10 01 15	bottom ash, slag and boiler dust from co-incineration other than those mentioned in 10 01 14
10 01 19	wastes from gas cleaning other than those mentioned in 10 01 05, 10 01 07 and 10 01 18
10 01 24	sands from fluidised beds
10 02	wastes from the iron and steel industry
10 02 01	wastes from the processing of slag
10 02 02	unprocessed slag
10 02 08	solid wastes from gas treatment other than those mentioned in 10 02 07
10 02 10	mill scales
10 02 14	filter cakes from gas treatment other than those mentioned in 10 02 13
10 02 15	other filter cakes
10 03	wastes from aluminium thermal metallurgy
10 03 02	anode scraps
10 03 05	waste alumina
10 03 16	skimmings other than those mentioned in 10 03 15
10 03 18	carbon-containing wastes from anode manufacture other than those mentioned in 10 03 17
10 03 24	solid wastes from gas treatment other than those mentioned in 10 03 23
10 03 26	filter cakes from gas treatment other than those mentioned in 10 03 25
10 03 28	wastes from cooling-water treatment other than those mentioned in 10 03 27
10 03 30	wastes from treatment of salt slags and black drosses other than those mentioned in 10 03 29

10 04	wastes from lead thermal metallurgy
10 04 10	wastes from cooling-water treatment other than those mentioned in 10 04 09
10 05	wastes from zinc thermal metallurgy
10 05 01	slags from primary and secondary production
10 05 09	wastes from cooling-water treatment other than those mentioned in 10 05 08
10 05 11	dross and skimmings other than those mentioned in 10 05 10
10 06	wastes from copper thermal metallurgy
10 06 01	slags from primary and secondary production
10 06 02	dross and skimmings from primary and secondary production
10 06 10	wastes from cooling-water treatment other than those mentioned in 10 06 09
10 07	wastes from silver, gold and platinum thermal metallurgy
10 07 01	slags from primary and secondary production
10 07 02	dross and skimmings from primary and secondary production
10 07 03	solid wastes from gas treatment
10 07 05	filter cakes from gas treatment
10 07 08	wastes from cooling-water treatment other than those mentioned in 10 07 07
10 08	wastes from other non-ferrous thermal metallurgy
10 08 09	other slags
10 08 11	dross and skimmings other than those mentioned in 10 08 10
10 08 13	carbon-containing wastes from anode manufacture other than those mentioned in 10 08 12
10 08 14	anode scrap
10 08 18	filter cakes from flue-gas treatment other than those mentioned in 10 08 17
10 08 20	wastes from cooling-water treatment other than those mentioned in 10 08 19
10 09	wastes from casting of ferrous pieces
10 09 03	furnace slag
10 09 06	casting cores and moulds which have not undergone pouring other than those mentioned in 10 09 05
10 09 08	casting cores and moulds which have undergone pouring other than those mentioned in 10 09 07
10 09 14	waste binders other than those mentioned in 10 09 13
10 09 16	waste crack-indicating agent other than those mentioned in 10 09 15
10 10	wastes from casting of non-ferrous pieces
10 10 03	furnace slag
10 10 06	casting cores and moulds which have not undergone pouring, other than those mentioned in 10 10 05
10 10 08	casting cores and moulds which have undergone pouring, other than those mentioned in 10 10 07
10 10 14	waste binders other than those mentioned in 10 10 13
10 10 16	waste crack-indicating agent other than those mentioned in 10 10 15
10 11	wastes from manufacture of glass and glass products
10 11 03	waste glass-based fibrous materials
10 11 10	waste preparation mixture before thermal processing, other than those mentioned in 10 11 09
10 11 12	waste glass other than those mentioned in 10 11 11
10 11 16	solid wastes from flue-gas treatment other than those mentioned in 10 11 15
10 11 18	filter cakes from flue-gas treatment other than those mentioned in 10 11 17
10 12	wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 01	waste preparation mixture before thermal processing
10 12 05	filter cakes from gas treatment
10 12 06	discarded moulds
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 10	solid wastes from gas treatment other than those mentioned in 10.12 09

10 12 12	wastes from glazing other than those mentioned in 10.12.11
10 13	wastes from manufacture of cement, lime and plaster and articles and products made from them
10 13 01	waste preparation mixture before thermal processing
10 13 04	wastes from calcination and hydration of lime
10 13 07	filter cakes from gas treatment
10 13 10	wastes from asbestos-cement manufacture other than those mentioned in 10 13 09
10 13 11	wastes from cement-based composite materials other than those mentioned in 10 13 09 and 10 13 10
10 13 13	solid wastes from gas treatment other than those mentioned in 10 13 12
10 13 14	waste concrete
11	WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO METALLURGY
11 01	wastes from chemical surface treatment and coating of metals and other materials (for example galvanic processes, zinc coating processes, pickling processes, etching, phosphating, alkaline degreasing, anodising)
11 01 10	filter cakes other than those mentioned in 11 01 09
11 01 14	degreasing wastes other than those mentioned in 11 01 13
11 02	wastes from non-ferrous hydrometallurgical processes
11 02 03	wastes from the production of anodes for aqueous electrolytical processes
11 02 06	wastes from copper hydrometallurgical processes other than those mentioned in 11 02 05
11 05	wastes from hot galvanising processes
11 05 01	hard zinc
11 05 02	zinc ash
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	ferrous metal filings and turnings
12 01 03	non-ferrous metal filings and turnings
12 01 05	plastics shavings and turnings
12 01 13	welding wastes
12 01 17	waste blasting material other than those mentioned in 12 01 16
12 01 21	spent grinding bodies and grinding materials other than those mentioned in 12 01 20
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging
15 02	absorbents, filter materials, wiping cloths and protective clothing
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13.14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 02	wastes from electrical and electronic equipment
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13

16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 03	off-specification batches and unused products
16 03 04	inorganic wastes other than those mentioned in 16 03 03
16 03 06	organic wastes other than those mentioned in 16 03 05
16 06	batteries and accumulators
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
16 11	waste linings and refractories
16 11 02	carbon-based linings and refractories from metallurgical processes others than those mentioned in 16 11 01
16 11 04	other linings and refractories from metallurgical processes other than those mentioned in 16 11 03
16 11 06	linings and refractories from non-metallurgical processes others than those mentioned in 16 11 05
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastic
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	iron and steel
17 04 06	Tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
17 06	insulation materials and asbestos-containing construction materials
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 08	gypsum-based construction material
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 01	wastes from incineration or pyrolysis of waste
19 01 02	ferrous materials removed from bottom ash
19 01 12	bottom ash and slag other than those mentioned in 19 01 11

19 01 18	pyrolysis wastes other than those mentioned in 19 01 17
19 01 19	sands from fluidised beds
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 03	premixed wastes composed only of non-hazardous wastes
19 02 10	combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 04	vitrified waste and wastes from vitrification
19 04 01	vitrified waste
19 05	wastes from aerobic treatment of solid wastes
19 05 01	non-composted fraction of municipal and similar wastes
19 05 02	non-composted fraction of animal and vegetable waste
19 05 03	off-specification compost
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber
19 12 05	Glass
19 12 07	wood other than that mentioned in 19 12 06
19 12 08	Textiles
19 12 09	minerals (for example sand, stones)
19 12 10	combustible waste (refuse derived fuel)
19 13	wastes from soil and groundwater remediation
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	Glass
20 01 08	biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	Textiles
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 01 41	wastes from chimney sweeping
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 02 02	soil and stones
20 03	other municipal wastes
20 03 01	mixed municipal waste
20 03 02	waste from markets
20 03 03	street-cleaning residues
20 03 07	bulky waste

2.3 Operating techniques

- 2.3.1 The activities shall be operated using the techniques and in the manner described in Table 2.3 below.

Table 2.3 Operating techniques

1. The Operator shall:

- (a) following any fire or if required by the Environment Agency, submit to the Environment Agency for approval within the period specified a fire prevention plan;
- (b) implement the approved fire prevention plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

The fire prevention plan shall as a minimum specify:

- (i) the total amount of waste that will be stored on site at any one time and if more than one type of waste is to be stored at the site the total amount of each type of waste;
- (ii) the maximum time each type of waste will be stored on site;
- (iii) the method of storage of each type of waste;
- (iv) the maximum volume of each waste pile in m³;
- (v) the location within the site where each type of waste will be stored;
- (vi) the maximum size of any waste pile stack stipulating the maximum height, width and depth;
- (vii) the minimum separation (fire break) distance between waste piles or storage areas;
- (viii) if fire walls are used in place of fire breaks, full details of the design and construction of such walls;
- (ix) the steps put in place to prevent and minimise the risk of a fire or of it spreading within the site or from the site;
- (x) the steps put in place to extinguish a fire if a fire starts;
- (xi) the steps and procedures to be followed if a fire occurs on site, including how the impact or emissions from a fire that may affect people or the environment will be minimised and mitigated; and
- (xii) the provisions made to enable safe access to the site for fire and rescue services, including how the impact on people or the environment of water used in fighting the fire will be managed and minimised.

2. Unless stored or treated outside as specified waste³:

- a) all bulking, transfer or treatment of waste shall be carried out inside a building;
- b) all waste shall be stored in a building or within a secure container.
- c) all waste shall be stored and treated on an impermeable surface with sealed drainage system.

3. Specified waste shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system.

2.4 The site

- 2.4.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit.

2.4.2 The activities shall not be carried out within 500 metres of a European Site or a SSSI.

2.4.3 The activities shall not be carried out within 50m of any well spring or borehole used for the supply of water for human consumption. This must include private water supplies.

³ "specified waste" is defined in section 4.4 of these standard rules.

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- 2.4.4 No treatment of specified waste, unless undertaken in a building, shall take place within a specified AQMA.

2.5 Technical Requirements

Waste battery and accumulator treatment

- 2.5.1 Treatment of waste batteries and accumulators must meet the minimum requirements set out in Annex III, Part A of Directive 2006/66/EC of the European Parliament and of the Council on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC.

3 – Emissions and monitoring

3.1 Emissions of substances not controlled by emission limits

- 3.1.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.1.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.1.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.2 Odour

- 3.2.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable, to minimise, the odour.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.3 Noise and vibration

- 3.3.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the

operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable, to minimise, the noise and vibration.

3.3.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan;
- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 – Information

4.1 Records

4.1.1 All records required to be made by these standard rules shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval; and
- (d) be retained, unless otherwise agreed by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by these standard rules, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by these standard rules to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 Within one month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

4.3.1 The Environment Agency shall be notified without delay following the detection of:

- (a) any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
- (b) the breach of a limit specified in these standard rules; or
- (c) any significant adverse environmental effects.

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- 4.3.2 Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by Stock Exchange rules:
- a) Where the operator is a registered company:
 - any change in the operator's trading name, registered name or registered office address; and
 - any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
 - b) Where the operator is a corporate body other than a registered company:
 - any change in the operator's name or address; and
 - any steps taken with a view to the dissolution of the operator.
 - c) In any other case:
 - the death of any of the named operators (where the operator consists of more than one named individual);
 - any change in the operator's name(s) or address(es); and
 - any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case them being in a partnership, dissolving the partnership.

4.4 Interpretation

- 4.4.1 In these standard rules the expressions listed below shall have the meaning given.
- 4.4.2 In these standard rules references to reports and notifications mean written reports and notifications, except when reference is being made to notification being made "without delay", in which case it may be provided by telephone.

"accident" means an accident that may result in pollution.

"Annex IIA" means Annex IIA to Directive 2006/12/EC of the European Parliament and of the Council of 5 April 2006 on Waste.

"authorised officer" means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in Section 108(4) of that Act.

"building" means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

"D" means a disposal operation provided for in Annex IIA to Directive 2006/12/EC of the European Parliament and of the Council of 5 April 2006 on Waste.

"emissions of substances not controlled by emission limits" means emissions of substances to air, water or land from the activities, either from emission points specified in these standard rules or from other localised or diffuse sources, which are not controlled by an emission limit.

"European Site" means Special Area of Conservation or candidate Special Area of Conservation or Special Protection Area or proposed Special Protection Area in England and Wales, within the meaning of Council Directives 79/409/EEC on the conservation of wild birds and 92/43/EEC on the conservation of natural

habitats and of wild flora and fauna and the Conservation (Natural Habitats &c) Regulations 1994. Internationally designated Ramsar sites are dealt with in the same way as European sites as a matter of government policy and for the purpose of these rules will be considered as a European Site.

"groundwater" means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

"impermeable surface" means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface, and should be read in conjunction with the term "sealed drainage system" (below).

"pollution" means emissions as a result of human activity which may—

- (a) be harmful to human health or the quality of the environment,
- (b) cause offence to a human sense,
- (c) result in damage to material property, or
- (d) impair or interfere with amenities and other legitimate uses of the environment.

"quarter" means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

"R" means a recovery operation provided for in Annex IIB to Directive 2006/12/EC of the European Parliament and of the Council of 5 April 2006 on Waste.

"sealed drainage system" in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

- (a) no liquid will run off the surface otherwise than via the system;
- (b) except where they may lawfully be discharged to foul sewer, all liquids entering the system are collected in a sealed sump.

"specified AQMA" means an air quality management area within the meaning of the Environment Act 1995 which has been designated due to concerns about particulate matter in the form of PM₁₀.

"specified waste" means the following waste codes in Table 2.2: 01 01 01, 01 01 02, 01 04 08, 01 04 09, 01 04 13, 02 04 01, 10 11 12, 10 12 08, 10 13 14, 15 01 07, 17 01 01, 17 01 02, 17 01 03, 17 01 07, 17 02 02, 17 03 02, 17 05 04, 17 05 08, 19 12 05, 19 12 09 and 20 02 02.

"SSSI" means Site of Special Scientific Interest within the meaning of the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000).

"Waste code" means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk. 'List of Wastes' means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste, as amended from time to time.

"year" means calendar year commencing on 1st January.

When the following terms appear in the waste code list in table 2.2 for that table they have the meaning given below:

'hazardous substance' means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008

'heavy metal' means any compound of antimony, arsenic, cadmium, chromium (VI), copper, lead, mercury, nickel, selenium, tellurium, thallium and tin, as well as these materials in metallic form, as far as these are classified as hazardous substances

'PCBs' means

- polychlorinated biphenyls
- polychlorinated terphenyls
- monomethyl-tetrachlorodiphenyl methane, Monomethyl-dichloro-diphenyl methane, Monomethyldibromo-diphenyl methane
- any mixture containing any of the above mentioned substances in a total of more than 0,005 % by weight

'transition metals' means any of the following metals: any compound of scandium, vanadium, manganese, cobalt, copper, yttrium, niobium, hafnium, tungsten, titanium, chromium, iron, nickel, zinc, zirconium, molybdenum and tantalum, as well as these materials in metallic form, as far as these are classified as hazardous substances.

'stabilisation' means processes which change the hazardousness of the constituents in the waste and transform hazardous waste into non-hazardous waste.

'solidification' means processes which only change the physical state of the waste by using additives without changing the chemical properties of the waste.

'partly stabilised wastes' means wastes containing, after the stabilisation process, hazardous constituents which have not been changed completely into non-hazardous constituents and could be released into the environment in the short, middle or long term.

End of standard rules

APPENDIX 2: HIGHWAYS TECHNICAL NOTE

1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

1.2 REFERENCES

1.3 ASSUMPTIONS

1.4 DEFINITIONS

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Technical Note

Project No: ITB13091
Title: Waste Authority Highways Response
Ref: ITB13091-036 TN
Date: 26 January 2021

SECTION 1 Introduction

- 1.1 Redrow Homes Limited and Wates Developments Limited have i-Transport LLP to provide highways and transport advice in relation to the proposed development of Ford Airfield. A planning application (F/5/20) has been submitted to Arun District Council (ADC) for the reconfiguration of Ford Market, including revised market access, hardstanding for replacement vehicular parking and associated infrastructure, landscape and ancillary and site preparation works.
- 1.2 The planning application was accompanied by detailed assessment of highways and transport matters in the form of a Transport Statement. In addition, a further planning application has been submitted for a residential development on adjacent land accompanied by a Transport Assessment – some of data within this document has been used to inform the traffic capacity analysis for the proposed Market development (e.g. baseline traffic surveys).
- 1.3 West Sussex County Council (WSCC), in their capacity as the local highway authority and statutory consultee in relation to matters of highways and transportation, has responded to planning application F/5/20 and no objection has been raised in relation to application F/4/20, subject to planning conditions relating to the provision of pedestrian and emergency access and parking provision.
- 1.4 WSCC, in their capacity as waste authority, has raised an objection to planning application and copies of the responses are provided at **Appendix A**. These objections include reference to matters of highways and transportation, as summarised below:
 - That changes to the access arrangements to not prevent or prejudice the use of the existing or allocated waste management sites;
 - Consideration of the potential for conflict between market traffic and that of waste management sites;

- That no obstruction of access to these facilities would occur (particularly during peak market hours); and
- Consideration of the vehicular traffic generated by the waste sites, and that the site has the potential to generate a greater volume of traffic than that currently in operation.

1.5 While matters of access and impact have been considered in detail within transport submissions accompanying the planning application, which have been reviewed by the statutory consultee for highways and transportation who have raised no objection to the proposed development, this Technical Note (TN) has been prepared to summarise the relevant transport matters to address the points raised in the WSCC Waste Authority responses. The remainder of the TN is structured as follows:

- Section 2 – Access
- Section 3 – Traffic Impact
- Section 4 – Summary and Conclusions

SECTION 2 Access

2.1 Existing Arrangement

- 2.1.1 The eastern runway of Ford Airfield currently provides car parking for both the market and/or car boot operations that take place on Thursdays, Saturdays and Sundays. Access to the car parking is obtained via the far western extent of the access road extending from the Ford Road 'Hunterford' junction.
- 2.1.2 At present, vehicles both enter and exit the car park from a single point of access. Access to the Viridor and Grundon waste sites, as well as the water treatment plant, is obtained via priority junctions formed with the access road. Vehicles entering the car park have priority over these junctions as the 'major' arm of the junction. The arrangement is annotated in **Image 2.1**.

Image 2.1: Existing Access Arrangement

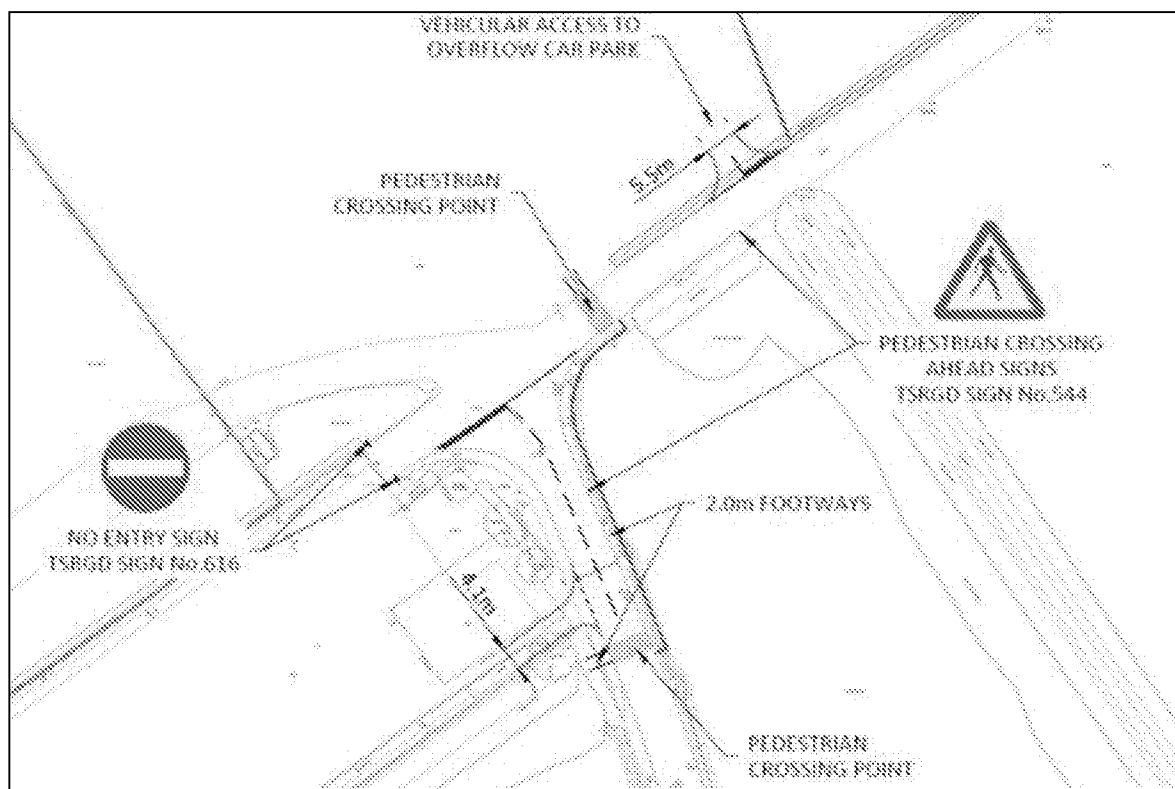


Source: Google Maps

2.2 Proposed Access Arrangements

- 2.2.1 A reconfiguration of the site access arrangements is proposed as part of the planning application. The arrangements are included within the TS submitted alongside application F/5/20 and are presented in **Drawing ITB13091-GA-036 Rev E**, an extract of which is presented in **Image 2.2**.

Image 2.2: Proposed Main Car Park Access Arrangement

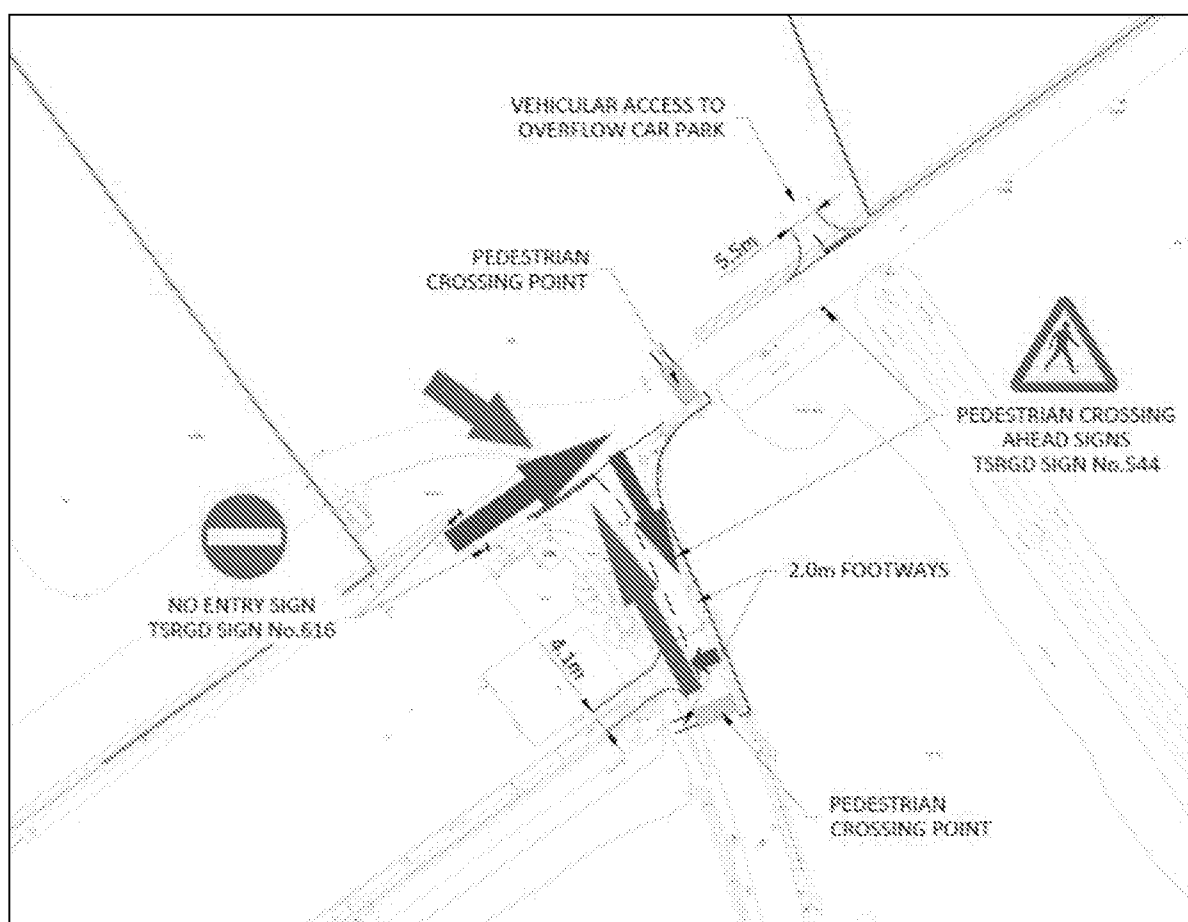


Source: ITB13091-GA-036 Rev E

- 2.2.2 Since submission of the planning application, and access road connecting to Grundon has been implemented and is now operational (as consented under WSCC/027/18). While the access road is not shown on the access drawing, it does not alter the operation of the arrangement given that the road is formed via an extension of the existing Waste Water Treatment Works (WWTW) access junction, and it does not form a new connection onto the access road itself.
- 2.2.3 The proposed car park arrangement provides for dedicated entry and exit points. Vehicles accessing the car park will turn left at the Viridor junction and be required to turn right into the car park access. In accordance with the conventional use of roads, vehicles waiting to turn right will be required to give way to oncoming vehicles (i.e., vehicles emerging from Viridor will have priority over vehicles waiting to turn right into the site). Therefore, vehicles entering the car park access will not present an obstruction.

- 2.2.4 While the access will be gated outside of operational periods to prevent trespass, during operation there will be no barrier or gate system that will restrict immediate access to the car park; vehicles entering the car park will be able to proceed immediately and not obstruct the northbound traffic flow. However, if required, carriageway demarcation can be placed at the access to make it clear to all users that the access should not be obstructed at any time – for example, 'Keep Clear' or yellow box demarcation.
- 2.2.5 Vehicles exiting the car park will continue to do so from the existing car park access. No alteration of the junction is proposed, and it will continue to operate in the manner it has previously operated – vehicles emerging from the car park will continue to have priority over the waste access arms. However, vehicles emerging from either the WWTW/Grundon access or from the Viridor access will now only be presented with vehicles approaching from a single direction, as vehicles entering the car park will turn left at, as opposed to travelling through, the junction. The arrangement is annotated in **Image 2.3**.

Image 2.3: Proposed Access Directional Flows

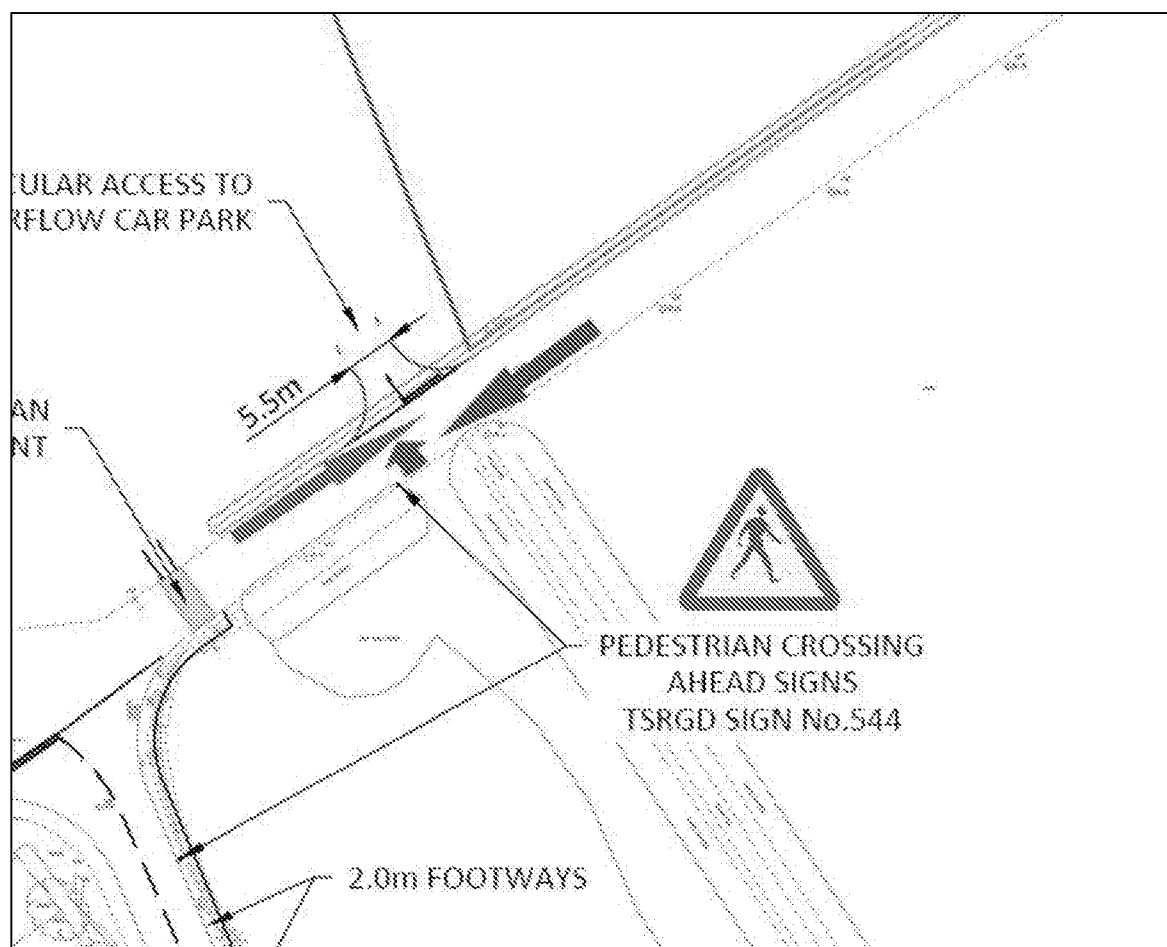


Source: ITB13091-GA-036 Rev E

2.3 Overflow Car Park

- 2.3.1 Access to the overflow car park is to be taken from the east-west access road. Vehicles will be required to either turn right into the car park when travelling in a westerly direction (i.e. from Ford Road) or to turn left in upon exiting the main car park, should it be full. As with the main car park, whilst the access will be gated outside of operational times, during operation it will remain open with no restrictions to access. The car park will also operate with one-way circulation, to prevent obstruction to vehicles entering the overflow car park. Accordingly, there will be no obstruction of the access road or access to waste uses since vehicles will be able to leave the access road and gain immediate access into the overflow car park.
- 2.3.2 In the event that a vehicle is travelling eastwards along the access road, a vehicle turning right into the overflow car park would be required to give way to an approaching vehicle. Vehicles waiting to turn right would not conflict with access to the waste uses – i.e. any waiting vehicles would wait to both the east of the waste accesses and the access to the overflow car park, as annotated in **Image 2.4**.

Image 2.4: Overflow Car Park Traffic Flows



Source: ITB13091-GA-036 Rev E

- 2.3.3 The junction to the overflow car park will operate as a conventional priority junction arrangement. Any vehicles emerging from the overflow car park will be required to give way to traffic already on the major arm of the junction.

2.4 Pedestrians

- 2.4.1 Two defined pedestrian points are proposed with the locations identified on the basis of providing clear intervisibility along the access roads. Given the nature of the vehicles using the access roads, means of providing priority to pedestrian crossing manoeuvres (e.g. a zebra crossing) have not been included in the proposals. Pedestrians are routed to the crossing points where they would cross the access road in conditions reflective of the wider highway network (with the provision of dropped kerbs and tactile paving) and by proceeding to cross when the road is clear.
- 2.4.2 The crossing points are connected by the introduction of a new 2.0m wide footway so that vehicles and pedestrians are not required to share the carriageway. The route is to be constructed adjacent to the existing carriageway, as not to narrow or alter the geometry of the existing junction.
- 2.4.3 Pedestrian signage and carriageway demarcation is proposed to make drivers aware of the possible presence of pedestrians. In order to replicate a typical highway arrangement, demarcation and signage will be installed that is consistent with the wider highway network – e.g., red surface demarcation and the use of TSRGD compliant signage.

2.5 Conclusions

- 2.5.1 As demonstrated above, the access proposals have considered how to provide for safe and suitable access that does not result in conflict with the waste uses, nor prejudice or preclude existing and future waste operations.
- 2.5.2 The access replicates conditions that drivers associated with the waste uses would experience on the wider highway network. This includes the provision of TSRGD compliant signage and the provision of conventional priority junction arrangements.
- 2.5.3 Measures have been taken to reduce the volume of traffic travelling through the junction, by providing access to the waste sites by diverting access to the south of the car park. In turn, this means that vehicles accessing the car park will now be required to give way to waste uses. Similarly, vehicles accessing the overflow car park will be required to give way to vehicles already on the main site access road.

- 2.5.4 Specific provision has been made for pedestrians, directing them to a defined crossing point where they will cross the road in conditions that are reflective of the wider highway network, and giving way to traffic using the carriageway and proceeding to cross when it is clear to do so. A defined footway provides a connection between the overflow car park and the market/car boot, so that vehicles and pedestrians are not required to share the carriageway.

SECTION 3 **Traffic Impact**

3.1 **Context**

3.1.1 The proposed development has been subject to comprehensive network capacity testing, presented in the Transport Statement accompanying the planning application. In addition, a further planning application has been submitted for a residential development on adjacent land (planning ref F/4/20) and was accompanied by a Transport Assessment – some of data within this document has been used to inform the traffic capacity analysis for the proposed Market development (e.g. baseline traffic surveys). The assessments have been scrutinised by WSCC, as local highway authority, and found to be acceptable.

3.1.2 These assessments include traffic both associated with the existing operation of the site as well as traffic associated with permitted, but not yet implemented, consents. The assessments also take into account the routing restrictions placed upon the consents (i.e., traffic accessing the site to and from the A259 via Yapton and Ford Road) and the alteration of access arrangements consented through WSCC/027/18 for waste uses consented under planning reference WSCC/096/13, whereby all traffic is routed through the Hunterford junction and required to approach and leave the site via Ford Road towards the A259.

3.1.3 The detailed assessments can be found in the following documents:

- Transport Statement ITB13091-022: Section 6
- Transport Assessment ITB13091-003: Sections 7-9 (planning ref: F/4/20)
- Environmental Statement: Chapter 10 (planning ref: F/4/20)

3.2 **Existing Operation**

3.2.1 The baseline data collection used to inform the assessments was undertaken on Thursday 5th July 2018, in addition to Automatic Traffic Count data collected for 7 days between the 2nd and 9th July 2018. The surveys captured data associated with the existing operation of the waste sites which, at this time, were accessed from the A259 via Yapton Road and Rollaston Park and exited to the A259 via Ford Road.

3.2.2 As part of the future year assessment scenarios, traffic growth has been applied to all baseline traffic figures as per the assessment parameters and methodologies approved by WSCC. It should be noted that none of the future year assessment scenarios has sought to remove traffic from the baseline traffic flows to reflect the fact that traffic associated with the Yapton Road/Rollaston Park access will no longer

utilise this link in future years. Further, no adjustment has been made to flows on Ford Road to offset the addition of traffic associated with WSCC/027/18 (as detailed in Section 3.3). This provides for a robust testing scenario through which an element of 'double counting' has occurred on waste use related traffic.

3.3 Permitted and Future Traffic

3.3.1 Committed development has been included within the future year testing scenarios, including the traffic and routing strategy associated with planning consent WSCC/027/18. The implementation of this consent requires all access to and from the Grundon waste facility from Ford Road via the newly constructed link between the Hunterford access road and the Grundon site.

3.3.2 Further, the consent increases the number of HGVs permitted to attend the site to 240 (120 in, 120 out) during weekdays and 120 (60 in, 60 out) on Saturdays. These movements have been included as a committed development in all testing scenarios, distributed across hours of operation consistent with the technical assessment accompanying WSCC/027/18, and in addition to the traffic attending the site recorded through the collection of baseline traffic data (i.e. the traffic has been double counted and therefore the findings are robust).

3.4 Network Impact

3.4.1 The impact of the proposed development has been subject to extensive capacity assessment, including analysis of the Hunterford/Ford Road junction. The outputs of the assessment have been reviewed by WSCC and a package of infrastructure improvements and financial contributions (towards mitigation identified through the Arun Transport Study) have been identified and agreed by WSCC, to be secured through Section 106 Agreement.

3.4.2 With regard to the operation of the Hunterford/Ford Road junction, the WSCC Highways response dated 6 October 2020 identifies that the junction onto Ford Road would operate satisfactorily and within capacity.

3.5 Summary and Conclusions

3.5.1 Comprehensive assessment of the traffic impacts of the proposed development have been undertaken across the technical submissions supporting the proposed development. These assessments have considered both the existing and permitted traffic associated with the operation of the waste uses, including paying due regard to routing restrictions and access locations. These assessments have been

reviewed by WSCC, in their capacity as statutory consultee on matters of highways and transportation and found to be acceptable.

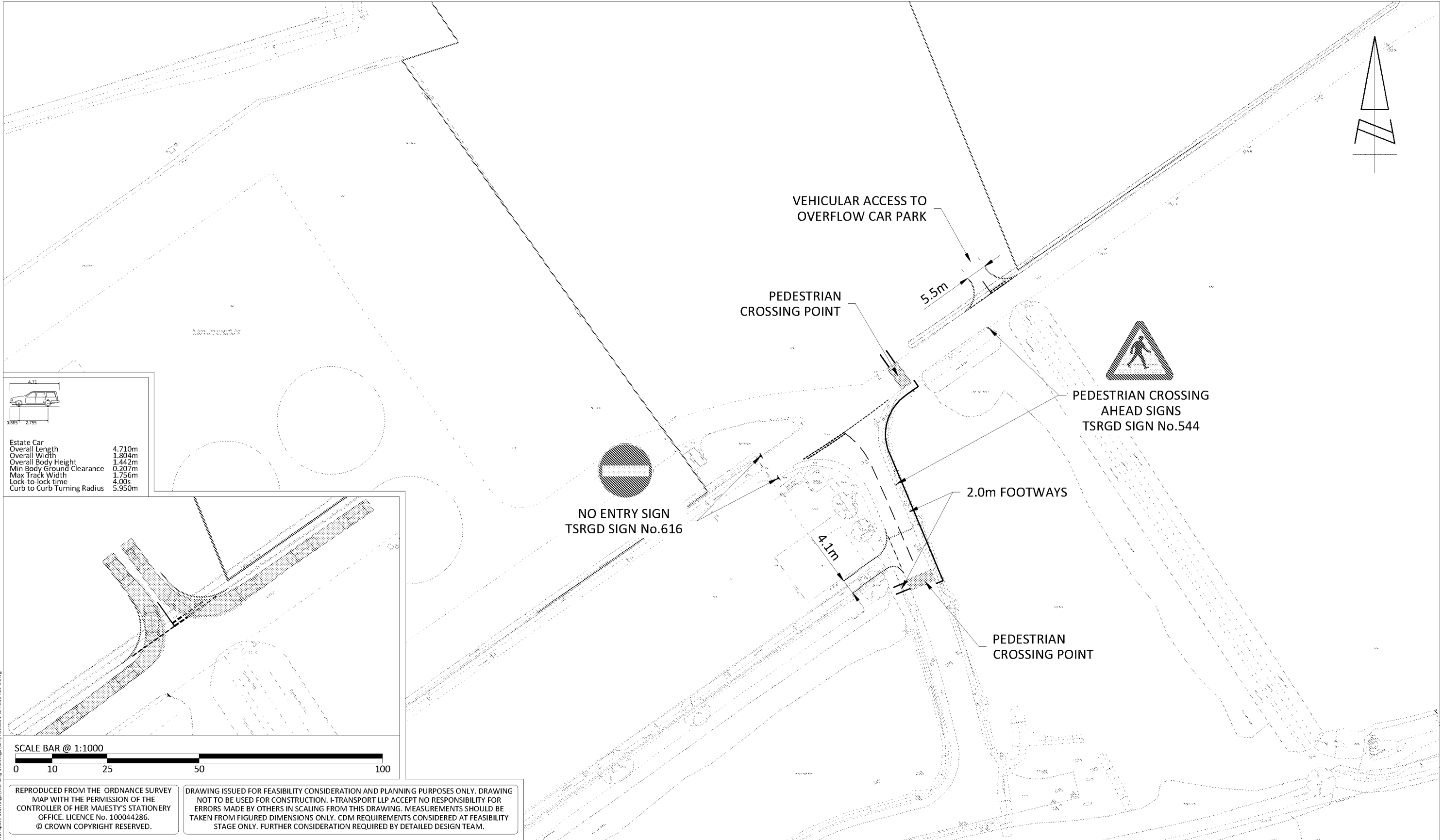
- 3.5.2 A package of highway improvements and financial contributions have been identified, and agreed by WSCC, to be secured through Section 106 Agreement. These improvements mitigate the impact of both the Ford Airfield developments, and the impacts of planned development allocated through the Arun Local Plan. The mitigation of strategic infrastructure has been identified through the Arun Transport Study that accompanied the adopted Local Plan; this study included traffic from waste uses and other commercial development within the network modelling.
- 3.5.3 With regard to the impact of the proposed development upon the Hunterford/Ford Road junction, the WSCC response dated 6 October 2020 to planning application F/4/20 identifies that the junction will operate safely and within capacity.

SECTION 4 Summary and Conclusions

- 4.1 Redrow Homes Limited and Wates Developments Limited have i-Transport LLP to provide highways and transport advice in relation to the proposed development of Ford Airfield. A planning application (F/5/20) has been submitted to Arun District Council (ADC) for the reconfiguration of Ford Market, including revised market access, hardstanding for replacement vehicular parking and associated infrastructure, landscape and ancillary and site preparation works.
- 4.2 The planning application was accompanied by detailed assessment of highways and transport matters in the form of a Transport Statement. In addition, a further planning application has been submitted for a residential development on adjacent land accompanied by a Transport Assessment – some of data within this document has been used to inform the traffic capacity analysis for the proposed Market development (e.g. baseline traffic surveys).
- 4.3 West Sussex County Council (WSCC), in their capacity as the local highway authority and statutory consultee in relation to matters of highways and transportation, has responded to planning application F/5/20 and no objection has been raised in relation to application F/4/20, subject to planning conditions relating to the provision of pedestrian and emergency access and parking provision.
- 4.4 WSCC, in their capacity as waste authority, has raised an objection to planning application with reference to matters of highways and transportation, as summarised below:
- That changes to the access arrangements to not prevent or prejudice the use of the existing or allocated waste management sites;
 - Consideration of the potential for conflict between market traffic and that of waste management sites;
 - That no obstruction of access to these facilities would occur (particularly during peak market hours); and
 - Consideration of the vehicular traffic generated by the waste sites, and that the site has the potential to generate a greater volume of traffic than that currently in operation.
- 4.5 Access to the market and car boot operations is to be provided through a dedicated entry and exit points to the main car park. The arrangement has been designed to provide for safe and suitable access that does not result in conflict with the waste uses, nor prejudice or preclude existing and future waste operations.

-
- 4.6 The access replicates conditions that drivers associated with the waste uses would experience on the wider highway network. This includes the provision of TSRGD compliant signage and the provision of conventional priority junction arrangements.
- 4.7 Measures have been taken to reduce the volume of traffic travelling through the junction by providing access to the waste sites by diverting access to the south of the car park. In turn, vehicles accessing the car park will now be required to give way to waste uses. Similarly, vehicles accessing the overflow car park will be required to give way to vehicles already on the main site access road.
- 4.8 Specific provision has been made for pedestrians, directing them to a defined crossing point where they will cross the road in conditions that are reflective of the wider highway network, and giving way to traffic using the carriageway and proceeding to cross when it is clear to do so. A defined footway provides a connection between the overflow car park and the market/car boot, so that vehicles and pedestrians are not required to share the carriageway.
- 4.9 Comprehensive assessment of the traffic impacts of the proposed development have been undertaken across the technical submissions supporting the proposed of Ford Airfield. These assessments have considered both the existing and permitted traffic associated with the operation of the waste uses, including paying due regard to routing restrictions and access locations. The assessments have been reviewed by WSCC, in their capacity as statutory consultee on matters of highways and transportation and found to be acceptable.
- 4.10 A package of highway improvements and financial contributions have been identified, and agreed by WSCC, to be secured through Section 106 Agreement. These improvements mitigate the impact of the Ford Airfield developments, and the impacts of planned development allocated through the Arun Local Plan. The mitigation of strategic infrastructure has been identified through the Arun Transport Study that accompanied the adopted Local Plan; this study included traffic from waste uses and other commercial development within the network modelling.
- 4.11 With regard to the impact of the proposed development upon the Hunterford/Ford Road junction, the WSCC response dated 6 October 2020 to planning application F/4/20 identifies that the junction will operate satisfactorily and within capacity.
- 4.12 On the basis of the above, it has been demonstrated that the proposed development will not prevent or prejudice the use of existing or future allocated waste uses.

DRAWINGS



4.71

0.885

2.755

Estate Car

Overall Length

Overall Width

Overall Body Height

Min Body Ground Clearance

Max Track Width

Lock-to-lock time

Curb to Curb Turning Radius

4.710m

1.804m

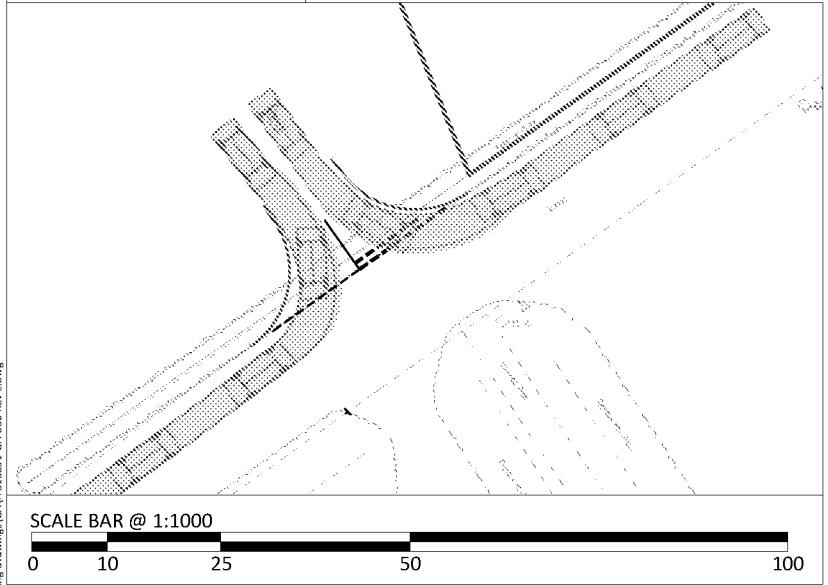
1.442m

0.207m

1.756m

4.00s

5.950m



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 Grove House, Lutyens Close, Chineham Basingstoke, Hampshire, RG24 8AG Tel: 01256 338640 Fax: 01256 338644 www.i-transport.co.uk				E	17.07.19	JD	MINOR AMENDMENTS	DS	DS	TITLE: FORD MARKET AND CAR BOOT CAR PARKING ACCESS ARRANGEMENTS	SCALE @ A3: 1:1000	CHECKED: DS	APPROVED: DS
				D	01.07.19	JD	MINOR AMENDMENTS	DS	DS		FILE REF: ITB13091	DRAWN: SH	DATE: 10.04.19
				C	15.05.19	SH	MINOR AMENDMENTS	DS	DS				
				B	03.05.19	SH	MINOR AMENDMENTS	DS	DS				
A	30.04.19	SH	MINOR AMENDMENTS	DS	DS								
REV	DATE	BY	DESCRIPTION	CHK	APD	PROJECT: FORD AIRFIELD	CLIENT: REDROW HOMES LIMITED & WATES DEVELOPMENTS LIMITED	DRAWING No: ITB13091-GA-036					
STATUS: DRAFT								PROJECT No: ITB13091				REV: E	

APPENDIX A – WASTE AUTHORITY RESPONSES



WSCC CONSULTATION RESPONSE:
County Planning – Minerals & Waste Planning Authority

TO:	Arun District Council Case Officer: Raymond Cole						
DATE:	2 April 2020						
LOCATION:	Ford Airfield Market, Ford						
SUBJECT:	F/5/20/PL - Reconfiguration of Ford Market, including revised market access, hardstanding for replacement vehicular parking and associated infrastructure, landscape, ancillary and site preparation works.						
RECOMMENDATION:	<table><tr><td>☐ Advice</td><td>☒ Objection</td></tr><tr><td>☐ Modification</td><td>☐ No Objection</td></tr><tr><td>☐ More Information</td><td>☐ Refusal</td></tr></table>	☐ Advice	☒ Objection	☐ Modification	☐ No Objection	☐ More Information	☐ Refusal
☐ Advice	☒ Objection						
☐ Modification	☐ No Objection						
☐ More Information	☐ Refusal						

Waste Policy Background

It is essential that existing waste facilities and allocated sites are safeguarded as they make an important contribution to the management of waste arising in West Sussex.

National Planning Policy for Waste (2014), paragraph 8, sets out the role of local planning authorities when determining planning applications for non-waste development, namely to ensure that the likely impact upon existing waste facilities and allocations are acceptable, and do not prejudice the implementation and operation of such facilities. This is reflected in Policies W2 and W10 of the West Sussex Waste Local Plan (2014)(the WLP), which requires that before granting permission for a non-waste development, the Local Planning Authority (LPA) must be satisfied that the proposed development would not prevent or prejudice the use of both existing and future waste management sites or infrastructure in or around the application site.

It is also echoed in Policy WM DM1 of the adopted Arun Local Plan, which sets out a general presumption against any development which may harm or prejudice the operation of existing and allocated waste facilities, and Policy EE3 of the Ford Neighbourhood Plan, which sets out the need for new development to ensure no conflict with existing uses and appropriate mitigation to minimise potential effects to identified to future occupants.

More generally, paragraph 182 of the NPPF notes that:

“existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”

In this case, key existing facilities which would be safeguarded by planning policy as existing waste sites, proximate to the proposed development include:

- **New Circular Technology Park**, Ford - Permitted for a thermal treatment plant (WSCC/096/13/F), to date part implemented as a Materials Recycling Facility with a limited throughput of waste. Ford EfW has confirmed their intention to further develop the site with a likely change to technology proposed, as per the EIA Scoping Opinion issued on 13 March 2020.

This site is also allocated in the WLP 2014 (Policy W10), known as 'Site North of Waste Water Treatment Works, Ford'. A new access road and increase in HGV movements was recently approved (ref. WSCC/027/18/F).

- **Ford Materials Recycling Facility**, Ford Airfield, Ford Road, Yapton –operated by Viridor (WSCC planning permission ref. F/19/05)
- **Ford Waste Water Treatment Works**, Ford Aerodrome – Southern Water (refs. F/7/99 and WSCC/051/12/F)

In order to demonstrate that the development proposed would not prevent or prejudice the use of both existing and future waste management sites, safeguarding guidance has been prepared which states that, among other things:

For proximate development, consideration will be given to whether it can proceed without compromising the ability of the site to operate effectively or whether mitigation would reduce the sensitivity of the development to an acceptable level, in accordance with the 'agent of change' principle. Information that allows the MPA/WPA and LPA to make this assessment, should be submitted with an application and should address matters including:

- *The distance of the proposal from the safeguarded site;*
- *Any existing screening from buildings or vegetation;*
- *Identification of pre-existing conditions such as background noise, light, odours, vibration, dust and other emissions;*
- *The potential for the site to deliver suitable mitigation including the identification of the means by which the development has introduced layout, design and other mitigation measures to mitigate potential effect on and from the safeguarded site;*
- *Confirmation of pre-application consultation/engagement with the minerals or waste infrastructure operator (to demonstrate a full understanding of the existing and potential future operation of the site, including hours of operation, level of activity and likely sources of noise, light, odours, vibration, dust and other emissions);*
- *Where appropriate, a full assessment of issues such as noise and light;*
- *Statement of the overall compatibility of the development with the minerals or waste infrastructure. (para 3.3)*

It is recommended that this information should be submitted in the form of a Waste Infrastructure Statement. It is noted that no such Statement has been submitted as part of the planning application, and the matters set out above have not otherwise been covered off in the submission.



The submission fails to robustly take into account the potential impacts or compatibility with current and future waste management sites.

In particular, it is noted that the proposed development would result in the diversion of all existing market traffic to the east via an access to the highway network, which is shared with all of the above noted waste management facilities. It is further noted that the proposed development includes the provision of a new overflow car park and pedestrian facilities which could also impact upon, or be affected by, existing waste management facilities.

The LPA will need to take into account any comments of WSCC as Highway Authority with regard to highway safety and capacity; however, in waste facility safeguarding terms, it will be essential that the applicant demonstrates that any potential changes to access arrangements would not prevent or prejudice the use of the existing or allocated waste management sites. This should include consideration of the potential for conflict between market traffic and that of waste management sites, and ensure that no obstruction of access to these facilities would occur (particularly during peak market hours).

With particular regard to the Circular Technology Park (CTP), this site is allocated as a strategic waste site, and planning permission has been granted, and part implemented, for an energy recovery facility. As a result, the baseline position for any assessments must recognise and accurately reflect the realistic fall back position for the site, which will have a greater impact than the facility currently in operation, in particular with regard to the permitted volume of vehicular movements, and potential for conflict with any development sited in close proximity (e.g. visual, noise, odour, dust and air quality).

It is of note the submitted plans do not detail the existing access (and associated landscaping/drainage) to the CTP site, which is both implemented and in use. Submitted assessments do not take into account relevant EIA assessments provided in support of developments at the CTP site, or neighbouring waste sites, or controls attached to permissions thereto (e.g. routing, hours and volumes of HGV movements).

Consideration should be given to providing further mitigation (e.g. comprehensive screening planting/bunds) and any removal of trees/vegetation should be avoided or carefully considered to ensure that it would not open up wider views to existing and future waste management sites. All mitigation relied upon to demonstrate existing waste uses and their future development would not be compromised, must be clearly detailed.

The applicant is advised to directly consult the operators of the waste management sites identified above to establish any further key areas of concern.

The decision maker also should be satisfied that the proposals minimise waste generation, maximise opportunities for re-using and recycling waste, and where necessary include waste management facilities of an appropriate type and scale (Policy W23).

Conclusion

Existing and allocated waste management facilities/sites must be protected from inappropriate neighbouring development that could prejudice their efficient operation. The development proposed could impact upon the operation of three major waste management facilities, in particular by virtue of potential conflict or obstruction to their access. The submission fails to consider extant permitted development (e.g. the recently



completed and now sole access to the CTP site), compatibility therewith, or provide details of any mitigation required to ensure their efficient operation

Based on the information provided to date, the applicant has not demonstrated that the development would not prevent or prejudice the use of the existing or allocated waste management sites. Therefore, WSCC **objects** to the proposed development as it would be contrary to policies W2 and W10 of the WLP.

West Sussex Joint Minerals Local Plan (July 2018)

The site is not within areas identified as Mineral Safeguarding Areas within the West Sussex Joint Minerals Local Plan.

James Neave, Principal Planner





WSCC CONSULTATION RESPONSE:
County Planning – Minerals & Waste Planning Authority

TO:	Arun District Council Case Officer: Raymond Cole						
DATE:	25 June 2020						
LOCATION:	Ford Airfield Market, Ford						
SUBJECT:	F/5/20/PL - Reconfiguration of Ford Market, including revised market access, hardstanding for replacement vehicular parking and associated infrastructure, landscape, ancillary and site preparation works.						
RECOMMENDATION:	<table><tr><td>☐ Advice</td><td>☒ Objection</td></tr><tr><td>☐ Modification</td><td>☐ No Objection</td></tr><tr><td>☒ More Information</td><td>☐ Refusal</td></tr></table>	☐ Advice	☒ Objection	☐ Modification	☐ No Objection	☒ More Information	☐ Refusal
☐ Advice	☒ Objection						
☐ Modification	☐ No Objection						
☒ More Information	☐ Refusal						

These comments follow the submission of a Waste Infrastructure Statement (dated May 2020) prepared by the applicant. They should be read in conjunction with comments made on 2 April 2020.

Submitted Waste Infrastructure Statement

Policies W2 and W10 of the West Sussex Waste Local Plan (WLP) 2014 control development that would prevent or prejudice the use of existing and allocated waste management sites. The submitted Statement seeks to demonstrate how the proposal can be delivered without preventing or prejudicing the operation of existing waste facilities. It includes consideration of the relevant safeguarded waste management facilities as previously highlighted by this authority, and seeks to respond to the requirements of WSCC Safeguarding Guidance.

Although the Statement does identify the various existing waste facilities in the locality that could interact with the proposed development, it fails to robustly take into account the potential impacts or compatibility with current and future waste management sites. Accordingly, concerns raised by this authority dated 2 April 2020, have not been addressed.

It is accepted the established use of runway areas for the market already coexists alongside existing waste uses, which provides important context to the proposals, and should inform the scope of the Waste Infrastructure Statement. However, as previously noted, the proposals would result in an increase in both vehicular and pedestrian traffic on both the highway network and service roads to the east, which are shared with existing waste management facilities, and an allocated strategic waste site. It also includes the provision of a new overflow car park and pedestrian facilities that could also impact upon, or be affected by, existing waste management facilities.

Further, a planning application for the development of a Waste Sorting and Treatment Facility (WSTF) and Energy Recovery Facility (ERF) on the Strategic Waste Allocation site has recently been received by WSCC. Although this application is awaiting validation (expected shortly), it is recommended that both the applicant and determining authority



reviews the development proposals therein, and supporting assessments, with a view to ensuring the interactions between the proposals are given full consideration.

To reiterate key concerns as previously highlighted;

The LPA will need to take into account any comments of WSCC as Highway Authority with regard to highway safety and capacity; however, in waste facility safeguarding terms, it will be essential that the applicant demonstrates that any potential changes to access arrangements would not prevent or prejudice the use of the existing or allocated waste management sites. This should include consideration of the potential for conflict between market traffic and that of waste management sites, and ensure that no obstruction of access to these facilities would occur (particularly during peak market hours).

With particular regard to the Circular Technology Park (CTP), this site is allocated as a strategic waste site, and planning permission has been granted, and part implemented, for an energy recovery facility. As a result, the baseline position for any assessments must recognise and accurately reflect the realistic fall back position for the site, which will have a greater impact than the facility currently in operation, in particular with regard to the permitted volume of vehicular movements, and potential for conflict with any development sited in close proximity (e.g. visual, noise, odour, dust and air quality).

It is of note the submitted plans do not detail the existing access (and associated landscaping/drainage) to the CTP site, which is both implemented and in use. Submitted assessments do not take into account relevant EIA assessments provided in support of developments at the CTP site, or neighbouring waste sites, or controls attached to permissions thereto (e.g. routing, hours and volumes of HGV movements).

Consideration should be given to providing further mitigation (e.g. comprehensive screening planting/bunds) and any removal of trees/vegetation should be avoided or carefully considered to ensure that it would not open up wider views to existing and future waste management sites. All mitigation relied upon to demonstrate existing waste uses and their future development would not be compromised, must be clearly detailed.

The applicant is advised to directly consult the operators of the waste management sites identified above to establish any further key areas of concern.

The decision maker also should be satisfied that the proposals minimise waste generation, maximise opportunities for re-using and recycling waste, and where necessary include waste management facilities of an appropriate type and scale (Policy W23).

Conclusion

Existing and allocated waste management facilities/sites must be protected from inappropriate neighbouring development that could prejudice their efficient operation and future development. The development proposed could impact upon the operation of three major waste management facilities, in particular by virtue of potential conflict or obstruction to their access. The submission fails to consider extant permitted development (e.g. the recently completed and now sole access to the CTP site), compatibility therewith, or provide details of any mitigation required to ensure their efficient operation



Based on the information provided to date, the applicant has not demonstrated that the development would not prevent or prejudice the use of the existing or allocated waste management sites. Therefore, WSCC continues to **object** to the proposed development as it would be contrary to policies W2 and W10 of the WLP.

West Sussex Joint Minerals Local Plan (July 2018)

The site is not within areas identified as Mineral Safeguarding Areas within the West Sussex Joint Minerals Local Plan.

James Neave, Principal Planner

