

## James Neave

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**From:** Christian Smith [REDACTED]  
**Sent:** 27 September 2023 10:27  
**To:** James Neave  
**Cc:** Andrew Sierakowski; Kirstie May  
**Subject:** RE: Elbridge Farm - Further information required - JN to Agent 31 07 23  
**Attachments:** 3419\_WSCC flooding & drainage (LLFA) HW comments (04-09-23).pdf; GPP-RS-BR-EXT-22-02 v17 Site Layout Plan\_20092023\_A2.pdf

**\*\*EXTERNAL\*\***

James,

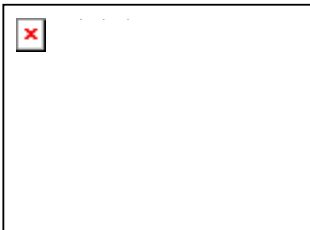
Please see a response to your email in red text below.

I will keep informed of progress in terms of addressing the LLFA's comments. If there are any other issues to resolve, please come back to me.

Thanks,

Kind regards,

**Christian Smith** MRTPI MCMi fCMgr  
Director



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**From:** James Neave <James.Neave@westsussex.gov.uk>  
**Sent:** Monday, July 31, 2023 2:06 PM  
**To:** Christian Smith [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Elbridge Farm - Further information required - JN to Agent 31 07 23

Christian,

We have now received numerous third party comments and most consultee responses (with the exception of Chichester District Council, and WSCC Ecology/Archaeology). FYI: I have chased these regularly and will continue to do so.

You will be aware that a number of issues have been raised, that will require the submission of further information/clarification. Having reviewed the submission officers also have a number of queries that are incorporated below;

#### Noise

- Please see the comments of the Arun EHO. I would be grateful if the queries/concerns over the assessment methodology and conclusions could be addressed by your noise consultant. **The responses from Chichester DC (and EHO) and the Senior Technical EHO at Arun DC now raise no concerns subject to the imposition of a planning condition controlling noise limits.**

#### Dust/mud on the highway

- As previously discussed, and a point specifically raised by the Highway Authority, consideration must be given to a more comprehensive wheel washing facility. Please advise if a bespoke facility would be possible and provide details as appropriate. **The Applicant proposes a rubble strip type wheel cleaning facility, which is easy to move and doesn't involve lots of water – see the example product in the link below. Given the road surface improvements proposed, this type of facility would be used on an as needed basis and will adequately deal with avoiding mud/detritus on the public highway. Vehicles will be required to drive slowly over the rubble strip to avoid any increase in noise.**

#### [Cleaning - EcoGreen Plant Hire](#)

#### Drainage/flooding

- Please see the detailed comments of the WSCC Flood Risk Management Team (LLFA). There are a number of matters that will require further clarification and updates to the submitted drainage proposals. **As you are aware an on-line meeting was held with the LLFA and an agreed approach to addressing the issues has been confirmed. Work on this matter is on-going and should be completed in roughly 3 weeks' time.**
- Given a swale is proposed within the site, please clarify how it will be ensured that stockpiles etc. would not block this feature. **The swale is likely to be removed from the drainage strategy as it was seen as an added benefit. The Applicant has confirmed, however, that this feature would be difficult to keep clean to be effective. It will therefore be removed from the drainage strategy and clarified in the forthcoming LLFA response.**

#### Trees

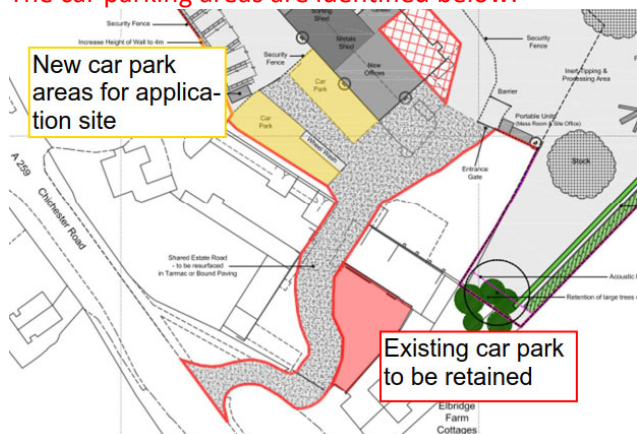
- Please see the comments of the WSCC Arboriculturist that will need to be addressed. In addition, of particular note is the potential impact of new fencing on existing trees to the rear of Elbridge Farm Cottages. Given the apparent space available in this location, consideration should be given to providing a greater standoff. Further, there may be added benefit of dog-legging the permitter bund in this location which may remove the need for separate acoustic fencing and reinforce screening of the proposed extension area. To be explored by the applicant. **Please see attached the amended Site Layout Plan (v17), which proposes a stand-off from the existing trees to the rear of Elbridge Farm Cottages. Heras fencing will be secured before construction works commence to ensure that the existing trees are protected (RPZ and canopy's). The Applicant would be happy to accept a pre-commencement planning condition covering details of this and the suggested five-year aftercare management plan.**

#### Highways

- *It is unclear whether the transport statement (TS) has taken into account third party vehicular movements, or any movements associated with the companies skip storage facility to the rear of Babsham Lane. This should be clarified. The transport analysis allows for all vehicle movements associated with the recycling business operating at the site. The application is for an increase in tonnage of material passing through the site and this will be brought to the site by the site operator and third-party vehicles originating from various locations.*
- *Please clarify if the TS has taken into account any vehicular movements associated with the import/sale of primary aggregates\*. As above, the application seeks permission for an increase of tonnage of material passing through the site and this would include the import/sale of primary aggregates relating to the existing recycling business on site.*

- Existing and proposed parking arrangements should be clarified. The TS seems to present conflicting figures and in particular it is unclear where it proposed HGV and staff parking would take place as part of the proposals, and number of spaces that will be provided. It is of note that the TS suggests 'The development proposals will include dedicated car parking areas within the site to accommodate the required demands.' but limited detail is provided or specified on the plans. There is an existing car park close to the site access which is used for staff working at Elbridge Farm and visitors. The existing car and HGV parking areas are identified on Figure 5.1 of the TS (page 10). The parking strategy for the new development is to retain the existing car park close to the site access for Elbridge Farm but also provide dedicated car parking areas close to the Recycle Southern Yard. The TS states in para 5.16 that there will be an increase in staff numbers (7 additional personnel) – the additional parking areas will accommodate staff parking as well as overnight HGV parking.

The car parking areas are identified below:



### Fencing/Boundary Treatment

- During recent site visits (and as raised by third parties), tall poles and nets have been erected alongside fencing (litter fencing?). Further, much of the existing perimeter fencing is in a poor state of repair and/or not as per 2m Green material sheet security fencing as approved by the extant permission. Please clarify if the proposals are to include any netting on a permanent basis, and or whether there is any intention to replace/upgrade existing perimeter fencing that would be retained. **The tall poles and litter fencing will be removed. The Applicant acknowledges that the existing perimeter fencing is in a poor state of repair and intends to replace it with a green material sheet security fence as approved by the extant permission.**
- It is noted that the proposals are to increase the height of the boundary treatment adjacent to Elbridge Farmhouse up to 4m in height (planning statement 5.5.28 – 5.5.30). However, there seems to be conflicting information as to whether this would be via an increase in 'lego blocks', or additional timber fence 'topper' (or the elevation plan seems to suggest a separate wall)? Further the submitted 'Site layout Plan' seems to show a separate boundary (to the rear of stock bays ways). Proposed boundary treatments in this area should be clarified and indicated on the plans accordingly. **The increase in height of the boundary will be achieved by placing an additional timber fence topper on top of the concrete Lego block wall to provide the noise attenuation. This is reflected on the updated Site Layout Plan (v17).**

### General

- At present plant (e.g. excavators/screener) are located on top of stockpiles (that should be a maximum of 3m in height). Please clarify the reasons for this and in particular whether such arrangements would also occur under the current proposals. **The current proposals will provide more room for the inert recycling operations enabling the Applicant to maintain stockpile heights better. Excavators loading the screener need to be at an elevated position. This is only likely to occur occasionally.**
- It is noted that the 'storage bays' may contain primary aggregate (and understood that this may be for third party sale or for blending with processed waste). Please clarify, including the volumes imported/exported, whether this has been considered as part of the throughput of the site, and whether associated HGV movements have been considered.\* **The Applicant keeps small quantities of primary aggregates at the site**

on the occasions when small builders/landscapers depositing waste want to collect aggregate for construction/landscaping purposes. The Applicant has another site where the main primary aggregates are sold from. The primary aggregates make up a relatively small quantity of the overall throughput of the site and will not contribute to exceeding the proposed 75ktpa throughput.

- At present only a green waste storage skip is shown on the submitted plans. On site it was noted that there are various containers/skips around the site. If external areas are to be utilised for storage or plant (including Skip Storage or other segregated waste containers etc.), this should be identified on the plans. Like many water transfer facilities, the storage and movement of a small number of skip/containers on the site is a fluid situation and they are not located/stored in one particular location on the site. Drop off's and pick up's occur daily. Provided they are not stockpiled high (say no more than 2.5 metres), I can't see the benefit of identifying them on a plan.

I will advise in due course if further matters are raised by Ecology, Archaeology or Chichester District Council. Given the information sought above, I would be grateful for an indication as to when this might be expected, as there may be a need to consider agreeing an extension to the target determination date.

Regards,

James Neave

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