

Further Letter of Objection from Mr D. Trussler in support of the Goulder Family at Elmbridge Farmhouse, Chichester Road, Bognor Regis, PO21 5EF

Re. Additional Information and proposals submitted by the Agent/Applicant on 27/09/23 - Planning Application WSCC/021/23, Regularisation, consolidation and extension to the existing waste transfer facility, by Recycle Southern Limited, Elmbridge Farm Business Centre, Chichester Road, West Sussex PO21 5EF.

1. I refer to my letter of objection in support of the Goulder family on the 21st July 2023 regarding the above planning application that was submitted to WSCC. Following additional information and proposals submitted by the agent/applicant on the 27th September 2023 relating to this application, I write this further letter of objection on behalf of the Goulder family, as it is considered that these additional proposals are inadequate and unsatisfactory as they stand. Furthermore, it is considered that these proposed measures do not adequately protect the Goulder's health and wellbeing, nor do they adequately protect their property or their land, particularly, from the nuisance and harm that is currently being caused from dust, grit and litter being generated by the existing waste transfer facility or that being proposed for this waste operation. Therefore, the Goulder family wishes to maintain its objection to this application and to the additional information and proposals recently submitted by the agent, particularly on public health, amenity and air pollution grounds. On behalf of the Goulder family, I also make the following comments on the additional information and proposals recently provided by the agent.

2. **Proposed Wheel Cleaning Facility** - with regards to the 'rubble strip type' wheel cleaning facility that is now being proposed, in my view, this proposed measure is wholly inadequate and unsatisfactory for the scale and nature of waste transfer facility that exists and that which is being proposed in this open semi-rural location, adjoining residential properties including the Goulder's Elmbridge Farmhouse and that of the adjoining busy A259 Chichester Road. In my view, this type of 'rubble strip' wheel cleaning facility would not clean the lorry wheels satisfactorily given the amount of slurry and mud that is currently being generated in the existing waste facility nor would it satisfactorily clean the amount of lorries and their wheels that is being proposed within this expanded waste facility, particularly given the large areas of permeable hardstanding that exists and is being proposed within this waste operation. In my view, the build-up of slurry and mud that is and is likely to be generated in and around this 'rubble strip' wheel cleaning facility would constantly require removing, cleaning and washing with water in order to remove the mud and debris that would build up around this wheel cleaning facility and would not be effective in cleaning the wheels from mud or debris nor would it stop materials being tracked onto the highway. It is also my view, that in dry weather conditions, this type of 'rubble strip' wheel cleaning facility with its build-up of mud and debris and inadequate cleaning and washing would just be another source of dust that would cause further nuisance to the Goulder's property and to other nearby residents. Furthermore, as stated in my initial objection letter of the 21st July, it is my view, that a wheel spinner and wheel wash combination would be the most appropriate wheel wash facility for this type of waste facility in this location and I would support the Highway Authority's recent comments on this matter.

3. Proposed Fencing/Boundary Treatment along the Northwestern Boundary of Waste Site - with regards to the existing tall poles and litter fencing that have been erected along the northwestern boundary of the existing waste facility, it is welcomed that the agent acknowledges that this existing perimeter fence along this boundary is in a poor state of repair and intends to replace it with a 'green material sheet security fence.' However, in my view, the information and these proposed measures for this boundary are not adequate nor satisfactory and needs to be clarified and made clear, in order to fully assess what is this green material sheet security fence that is being proposed and what it would look like visually given that the Goulder's land immediately adjoins this waste site along this boundary where their horses are kept? Also, in my view, further information is required to fully assess precisely along what distance would this proposed fence be constructed to and precisely what height would it be erected to along this boundary in order to fully understand whether or not that this proposed fencing would satisfactorily protect the Goulder's land from litter, dust and grit pouring over from the existing and proposed waste facility onto their land? As stated in my initial objection letter of the 21st July, I have serious concerns that considerable amounts of litter, dust and grit are pouring over from the existing waste facility along the northwestern boundary of this site onto the Goulder's land where their horses are stabled, graze and are tended to without adequate protection being in place from the dust, grit and dust that is currently being generated by the existing waste facility and that which is likely to be generated from the proposed operations. Also, as stated in my July letter, if the proposed security fence along this northwestern is only a green mesh wire arrangement and only 2 metres high then, it is my view, that this would be wholly inadequate and unsatisfactory to protect the Goulder's land and property from any litter, dust and grit emanating from the existing waste facility or that being proposed. Furthermore, it is my view that this proposed fence along this boundary must be long enough, high enough and robust enough during all weather conditions to provide adequate and satisfactory protection to the Goulder's land from any litter, dust and grit arising from the existing waste facility and that being proposed throughout its existence. Also, as mentioned above, from a visual point of view from the Goulder's land, as it stands, the fencing along this boundary is a mish-mash of concrete blocks, damaged metal fencing, damaged wire mesh hanging, tall poles, views of damaged buildings, views of the waste operations including stockpiles of materials and plant and vehicles working which is a complete eyesore and unacceptable from a visual point of view and any information and measures proposed for this boundary needs to fully consider this aspect as well. As stated in my July letter, in my view, it is virtually impossible to prevent or mitigate against any litter, dust and grit blowing onto and causing nuisance to the Goulder's property and that of other sensitive receptors nearby unless this kind of waste facility is contained within a building or housed under cover. Furthermore, it is my view, that these type of waste operations are more suited and appropriate within a building on an industrial estate in an urban setting rather than being located in the open, within a semi-rural setting adjoining local residents and other sensitive receptors nearby as currently exists and that being proposed. Therefore, in my view, it is wholly incumbent upon the agent to provide the necessary and satisfactory information and proposals to ensure that the fencing/boundary treatment proposed along the northwestern boundary of this existing site and that proposed is fit for purpose and provides for the necessary and satisfactory protection of the Goulder's land

from any litter, dust and grit that may arise and also that it provides for satisfactory visual protection to the Goulder's property from the existing waste facility and that being proposed.

4. **Proposed Boundary Treatment adjacent to Elmbridge Farmhouse (southwestern boundary of waste site)** - with regards to the proposed treatment of the boundary fence adjacent to Elmbridge Farmhouse along the southwestern boundary of this waste facility, it is noted that the increase in height of this boundary will be achieved by placing an additional timber fence topper on top of the 'concrete lego block wall' to provide for noise attenuation. However, again, as I have stated above for the treatment of the proposed fence along the northwestern boundary of this waste facility, it is my view, that this information and these proposed measures are not adequate or satisfactory, nor is it just a matter of providing noise attenuation but it is also a matter of providing the necessary and satisfactory protection to Elmbridge Farmhouse, the Goulder family, their property and their garden from any dust, grit and litter arising from the existing waste facility and that being proposed. Along this boundary on the waste facility side, it is proposed that there would be one covered storage bay, one covered green waste skip, whilst there would also appear to be one wood waste bay uncovered and six aggregate bays uncovered along this boundary adjoining Elmbridge Farmhouse. In my view, all these uncovered bays would be exposed to the weather conditions and in dry conditions with the wind whipping around it is and would be a potential source of dust and grit arising from these bays that would pour over onto Elmbridge Farmhouse and the Goulder's property. Furthermore, given that there are considerable amounts of permeable hardstanding area in the southwestern part of this waste facility, it is considered that this area, particularly in dry weather conditions would be a further source of dust and grit pouring onto the Goulder's property when lorries and plant are circulating in this area. Given these comments on the treatment of this boundary, it is my view, that this additional information and these measures proposed to increase the height of this boundary fence by the agent are not adequate or satisfactory to protect the Goulder's property from any dust and grit that arise from this existing waste facility nor that being proposed. Again, as stated above, it is my view, that further information would be required to fully assess what would be the specification of the additional timber fence topper that is being proposed on top of the concrete lego block wall, would it be robust timber fencing to deal with all weather conditions? Also, additional information is required to fully assess along where and to what distance would this additional timber fence be constructed along this boundary and to what height would it be erected to in order to fully understand whether or not it would satisfactorily protect Elmbridge Farmhouse from the dust and grit that currently arises from the existing waste facility and that proposed. Again, as stated above, it's my view that these type of waste operations, including these type of storage bays should be under cover or housed within a building, particularly given that this waste facility is located immediately adjoining Elmbridge Farmhouse, in the open, within this semi-rural setting. Furthermore, as stated above, it is my view, that it is incumbent upon the agent to provide the necessary and satisfactory information and proposals to ensure that the fencing/boundary treatment along this boundary is fit for purpose and provides for the necessary and satisfactory protection from any dust, grit and litter that may arise from the existing and proposed waste operations.

5. Given my concerns and comments above on the additional information and proposals submitted by the agent on the 27th September and given my initial letter of objection on the 21st July on behalf of the Goulder family regarding this application (WSCC/021/23), I support the Goulder family's wish to maintain its objection to this application and to the additional information and proposals that have been submitted, particularly, on public health, amenity and air pollution grounds. It is considered that this additional information and these proposed measures submitted are not fit for purpose and would not adequately and satisfactorily protect the property and land of Elmbridge Farmhouse nor the health and wellbeing of the Goulder family from dust, grit and litter that is currently being generated by the existing waste transfer or that being proposed. Furthermore, it is my view, that this additional information and these proposed measures submitted with this application do not overcome nor do they accord with WSWLP Policy W19 on public health and amenity grounds nor does it overcome or accord with ADLP Policy QE DM3 on Air Pollution grounds.

6. Given my objection, concerns and comments above on behalf of the Goulder family regarding this additional information and the proposed measures that have been submitted and given my initial objection letter of the 21st July, I would strongly urge WSCC, again, to consider 1) refusing this application (WSCC/021/23) on the above public health, amenity and air pollution grounds, particularly from the harm and nuisance that is being caused to the Goulder's lives and property and that of other nearby local residents by way of dust, grit and litter arising from this existing waste facility and that being proposed. In addition, again, I would strongly urge WSCC to consider 2) taking enforcement action to reduce and return this already expanded waste facility and operations to the scale and nature that was originally permitted in 2014 under application WSCC/036/14 and to ensure that those conditions that were imposed are complied with and enforced so that this existing waste transfer facility may continue to operate to an acceptable and appropriate scale and level, as originally envisaged, in this open semi-rural location, without causing harm and nuisance to public health, amenity and air pollution by way of dust, grit and litter to Elmbridge Farmhouse, the Goulder family or other nearby sensitive receptors. Alternatively, should WSCC be minded to approve this application, then I would strongly urge WSCC, again, to impose the most stringent of planning conditions to control matters including; plans - site layout; site throughput and volumes of waste materials; storage of materials in the open and stockpile heights; schemes for dust, grit and litter suppression and prevention measures; schemes for boundary treatment and fencing; schemes for landscaping and noise attenuation and scheme for wheel cleaning facility in order to fully protect Elmbridge Farmhouse, the Goulder family and other nearby residents public health and amenities from any air pollutants including that of dust, grit and litter from this existing waste facility and that proposed.

7. Finally, again, I would urge officers and members of WSCC to visit Elmbridge Farmhouse and the Goulder's property for themselves, before they recommend and determine this application, in order to fully understand and assess the impact of this existing waste facility and that being proposed upon the Goulder's lives and their property.

Mr D. Trussler on behalf of the Goulder family at Elmbridge Farmhouse – 23/10/2023

