

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

Re: Planning Application WSCC/021/23 - Regularisation, consolidation and extension to the existing waste transfer facility including an increase in the throughput of waste by Recycle Southern Limited - Elmbridge Farm Business Centre, Chichester Road, West Sussex PO21 5EF

1. I am a friend of the Goulder Family and I write this objection letter in support of their objection to the above planning application recently submitted by Recycle Southern to WSCC. I am also a Chartered Town Planner by profession having worked in the Mineral and Waste Planning business in both the public and private sectors for over 40 years. I was employed for the past 12 years as the Head of Planning, Minerals and Waste for a Waste Management Company which operated a Waste Transfer Station and an Energy from Waste Power Plant out of their Lancing Business Park site. Before that, I was employed by WSCC's County Planning Office for 30 years as the Planning and Enforcement Team Leader dealing with planning, compliance and enforcement matters relating to mineral and waste planning operations throughout West Sussex.
2. The Goulder family reside and are long term tenants of the property, known as Elmbridge Farmhouse. Elmbridge Farmhouse is accessed from Chichester Road (A259) and the late 19th century farmhouse and its garden, immediately adjoins Recycle Southern's application site along its southwest boundary. The farmhouse is approximately 30 metres from the applicants southwest site boundary. The Goulder's are also tenants of the land immediately to the north of Recycle Southern site, where they have stables and paddocks and keep their horses and walk them out and they graze there.
3. Existing position on Recycle Southern site and current problems of dust, grit and litter arising from this site - I know Elmbridge Farmhouse well and I have visited the Goulder property twice in the last few weeks and I am extremely concerned with the amount and levels of dust, grit and bits of litter ie. paper and plastics pouring over from the Recycle Southern site onto the Goulder's property and land in a totally uncontrolled manner. I have seen the photographs provided by the Goulders which shows considerable amounts of dust and grit within their farmhouse settling on windowsills and tables and outside within their garden where trees, shrubs and vehicles are covered in this dust and grit. During my visits to the property, I also witnessed considerable amounts of light brown coloured dust and grit covering their shrubs, trees and vehicles within their garden along with considerable amounts of dust and grit pouring from the waste operations of the Recycle Southern site onto land to the north and east of the application site. I also noted considerable amounts of dust, grit and bits of litter covering the grass, trees and other wild vegetation within the horse paddock area that the Goulders use. Given these amounts and levels of dust, grit and litter presently arising from these waste operations and covering the Goulder's property and land, I am also extremely concerned that this may be having a detrimental effect to the health and wellbeing of this family, and particularly for Karen Goulder who is asthmatic and has serious breathing and respiratory problems. I am also concerned that these levels of dust, grit and litter may be having a

detrimental effect to the Goulder's horses which live and feed on the grass and vegetation on the land immediately to the north of the application site.

4. Without visiting the actual Recycle Southern site, I also observed from the outside of this site, that there appeared to be a considerable number of points where sources of dust, grit and litter generation were arising that were contributing to this problem with large clouds of dust, grit and litter covering the Goulder's property. These areas on the Recycle Southern site included large stockpiles of unprocessed and processed soils and concrete, which are well in excess of 3 metres, as permitted under the original permission (WSCC/036/14) which are located along the northern boundary of the site. These stockpiles have a number of 360 excavators perched on top of them feeding concrete crushing and soil screening machinery without any apparent dust suppression measures in place, either on these stockpiles or on this machinery. In addition, it was observed that some concrete blocks have already been built to form a concrete wall, approximately 4 metres high along the southwest boundary of the application site, immediately adjoining the Goulder's property, presumably to form the proposed aggregates and waste wood storage bays as shown on the recently submitted application, whilst it was also observed that a metal fence has been constructed, approximately 2 metres high with some netting on top of the fence, presumably to catch any litter blowing from Recycle Southern site onto the Goulder's land to the north. However, from my observations, it appears that there is little cover on these aggregate and waste wood bays, nor does it appear that there are any dust suppression measures in place and it also appears that some of the metal fencing and much of the netting on top of the fencing is either, damaged or does not exist which is contributing to and exacerbating the problem relating to significant amounts of dust, grit and litter blowing onto the Goulder's land.

5. Application WSCC/021/23 and my objection in support of the Goulder family to this application - With regards to this application recently submitted by Recycle Southern to regularise and expand this existing waste transfer facility by more than doubling the site area and the throughput of waste materials that are to be dealt with at this site by the applicant, in the open, in this semi-rural area and in close proximity to residential properties, I strongly support the Goulder's objection to this proposal, particularly on the grounds of public health, amenity and air pollution due to the significant amounts of dust, grit and litter that are currently arising from the existing operations at this site and that are likely to arise from these proposed operations. Furthermore, the proposed Dust Management Plan that accompanies this application and the range of mitigation measures that are proposed to protect the health and amenity of the Goulder family and other local residents in the area are wholly inadequate and unsatisfactory, in my view. Whilst some actual or potential dust sources on the site may have been identified in the dust plan ie. all external stockpiles will be kept damp during dry/windy conditions and the screening/crushing plant is fitted with a water suppression system, it would appear, to date, that this has not happening, nor has it been adequately demonstrated or any evidence of this actually occurring on these existing stockpiles or the screening/crushing plant, from my observations. In addition, it is noted that no mention is made of how dust and grit may be suppressed when excavators are working on top of these stockpiles when moving and loading unprocessed and processed soils and concrete into elevated conveyors and hoppers on site.

Similarly, the same could be said of how dust and grit may be suppressed when front loading shovels are loading soils and concrete into elevated conveyors and hoppers. Whilst the dust plan mentions that high standards of housekeeping would be implemented to minimise track out and windblown dust and that effective staff training in respect of the causes and prevention of dust would be carried out, it would appear, to date, that none of these matters have been adequately demonstrated or evidenced on this site.

6. With regards to the proposed dust cannon and water holding tank which appears to be already located by the weighbridge in the central part of the site, it appears that its use and its effectiveness has not been evidenced nor has it been adequately demonstrated how it will suppress dust and grit arising from this site satisfactorily. The plan indicates that the use of the water/mist cannon is to minimise the dust from the operation of the trommel, adjacent to the weighbridge, which begs the question what role does the water cannon have in minimising dust and grit for the rest of the waste operations on the site, including the stockpiles of unprocessed and processed soils and concrete? In addition, it is noted that there appears to be no specifications or details on the type of water cannon to be employed, nor does it provide any information on the amounts of water that are likely to be required by the cannon during a working day; when is the cannon likely to be used and under what weather conditions; what is the range/area that the cannon may cover with water; is the cannon powered by electric or diesel; what level of noise is likely from the cannon when it's in use? In my view, this information is necessary to make an informed opinion on the likely level of effectiveness that may be achieved from this dust cannon and whether or not it will assist in the comprehensive minimisation of dust and grit arising from this site and whether or not it will provide acceptable levels of protection to the Goulder family and other sensitive receptors nearby from these air pollutants.
7. With regards to the standard good practice for site haulage identified in the plan, it is to be welcomed that all vehicles containing waste will be sheeted before arriving/leaving the site and that a speed limit of 10mph would be set for the site. However, whilst it is proposed that the shared estate road and entrance to the site will be resurfaced by tarmacing or bound paving, I am concerned that the rest of the site and the internal haul roads would be permeable hardstanding. In my view and experience, these internal roads and areas should also be resurfaced by tarmacing or bound paving because when they are dampened down these permeable areas become messy and covered in slurry causing more problems of tracking out materials onto the shared estate road and public highway. On this point, I am also concerned that the 'wheel cleaning facilities proposed at the exit of the site would be a brush and hose arrangement to ensure that the wheels of vehicles are suitably clean before using the internal access.' In my view and experience, this type of wheel cleaning facility is totally inadequate and unsatisfactory for the type, nature and scale of waste facility that exists and is being proposed in this location. In my view, the minimum requirement for such a wheel cleaning facility for this kind of waste facility should, at least, involve a wheel spinner and wheel wash combination which sprays high velocity water at all the contamination areas on the vehicles such as tyres, inside and out, including the mud flaps. It should also centrifugally spin the driven wheels on the spinner so that this cleaning action releases dangerous objects trapped from between the

double wheels and treads in the tyres sending it down to the collection tank rather than onto the road or even worse into a following vehicle on the road.

8. With regards to litter arising from the Recycle Southern site and blowing onto the Goulders land, I have observed large quantities of waste materials including builder's bags; plastics; polystyrene; paper; cardboard; pieces of wood; cloth and other bits of general rubbish which has been sorted from the skips being loaded by front loading shovels from the general waste bay area along the northwest boundary of Recycle Southern's site into articulated lorries before travelling to an appropriate landfill site. In my view, this is the likely source of where the litter arises from Recycle Southern's site before blowing onto the Goulder's land. As mentioned in section 4 above, I am concerned that the existing metal fencing along the northwest boundary of Recycle Southern's site, adjoining the Goulder's land is only 2 metres in height and is damaged in places, whilst some netting which has been erected on top of this fence is either damaged or does not exist and is totally inadequate and unsatisfactory, in my view, in preventing or mitigating against any bits of litter arising from Recycle Southern's operations blowing onto the Goulders land. Along with the dust and grit covering this land, it is my view, that these bits of litter that also blow onto their land are unsightly and potentially harmful to the horses that the Goulders keep and graze on this land. It is noted within the application submission, that it is proposed that a '2-metre-high green mesh wire security fence will be located around the perimeter of the proposed extension area' and that a 3-metre-high concrete wall with a soil bund being constructed between this wall and fence with some possible native tree and shrub planting with grass seeding on the outside face of the perimeter soil bund is also being proposed. Given my comments above, regarding the heights of the existing stockpiles and the methods of working with the machinery working on these stockpiles and around them and the dust mitigation proposed, it's my view, that the existing and proposed fencing, bunding and possible planting would be totally inadequate and unsatisfactory from preventing or mitigating against any dust, grit and litter arising from the existing or proposed waste operations and blowing onto the Goulders land or any other nearby residents for that matter. In my view and experience, it is virtually impossible to prevent or mitigate against dust, grit and litter blowing onto and causing harm or nuisance to the Goulders property and other residents nearby, unless this kind of waste facility is contained within a building or housed under cover, similar to those that already exist on this site. Furthermore, it's 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 in the open, within a rural semi-rural setting, adjoining local residents and other sensitive receptors nearby.
9. Given my concerns above, it is also my view, that this latest application by Recycle Southern to expand their waste operations on this site does not accord with the West Sussex Waste Local Plan (2014), Policy W19 on public health and amenity grounds, nor does it accord with the Arun District Local Plan (2018), Policy QE DM3 on air pollution grounds.
10. General waste planning comments - Whilst it is acknowledged and accepted that planning permission was granted by WSCC in 2014 (WSCC/036/14) for a relatively small waste transfer station in this semi-rural location, it must also be acknowledged and accepted that this waste

facility has already expanded to a great degree on this site and is, technically, in breach of planning control, in terms of breaches to conditions attached to the 2014 permission, including breaches to the site layout; volumes of materials being handled; dust suppression measures and stockpile heights and as such, these waste operations remain unauthorised and uncontrolled, until such time as WSCC is minded to approve Recycle Southern's latest application.

11. Conclusions - Given my concerns and comments above, I strongly support the Goulder's objection to this latest application by Recycle Southern (WSCC/021/23), particularly, on public health, amenity and air pollution grounds. Whilst it was accepted and established that this site was suitable and appropriate for a relatively small waste transfer facility in this semi-rural location in 2014, it is my view, that this latest application by Recycle Southern to regularise, consolidate and expand this waste transfer facility, by more than doubling its site area and throughput of waste, within this semi-rural area, in the open, alongside the Goulder's property and other sensitive receptors nearby, is not acceptable or appropriate, particularly, from the harm and nuisance that is being caused by way of dust, grit and litter currently arising from this site and that being proposed. Furthermore, it has not been demonstrated by the applicant that the existing operations which have already expanded, uncontrolled, or those measures that are proposed within this latest application and dust management plan can or could mitigate against any considerable amounts of dust, grit and litter arising from this site and preventing harm and nuisance to the Goulder's property or to other nearby residents and sensitive receptors. Furthermore, this latest application does not accord with WSWLP Policy W19 on public health and amenity grounds nor does it accord with ADLP Policy QE DM3 on Air Pollution grounds.

12. Given my objection, concerns and comments above, I would also strongly urge WSCC to consider 1) refusing planning application WSCC/021/23 on the above public health, amenity and air pollution grounds and the harm and nuisance that is being caused to the Goulder's lives and property and that of other local residents nearby by way of dust, grit and litter arising from this waste transfer facility. I would also strongly urge WSCC to consider 2) taking enforcement action to reduce and return the waste transfer 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 originally imposed are complied with and enforced, if necessary, so that this waste transfer facility may continue to operate to an acceptable and appropriate level and scale in this semi-rural location, without causing harm or nuisance to public health, amenity and air pollution by way of dust, grit and litter arising from this site and impacting upon the Goulder's property and other sensitive receptors nearby. Alternatively, should WSCC be minded to approve this latest application, then I would strongly urge WSCC to impose the most stringent of planning conditions on matters including: plans - site layout; site throughput and volumes of waste materials; storage of materials and stockpile heights; scheme for dust and grit suppression measures; scheme for the prevention of litter; scheme for fencing; scheme for landscaping and noise attenuation, in order that the Goulder's property and that of other nearby sensitive receptors public health, amenity, and the local environment is protected from any air pollutants including that of dust, grit and litter arising from this waste transfer facility .

13. I would also urge officers and members of WSCC to visit the Goulders property for themselves, before they recommend and determine this planning application, in order to fully understand and assess the impact of the existing and proposed operations of Recycle Southern's waste transfer facility upon the Goulder's lives and property.

Mr D. Trussler on behalf of the Goulder family.
21/07/23