

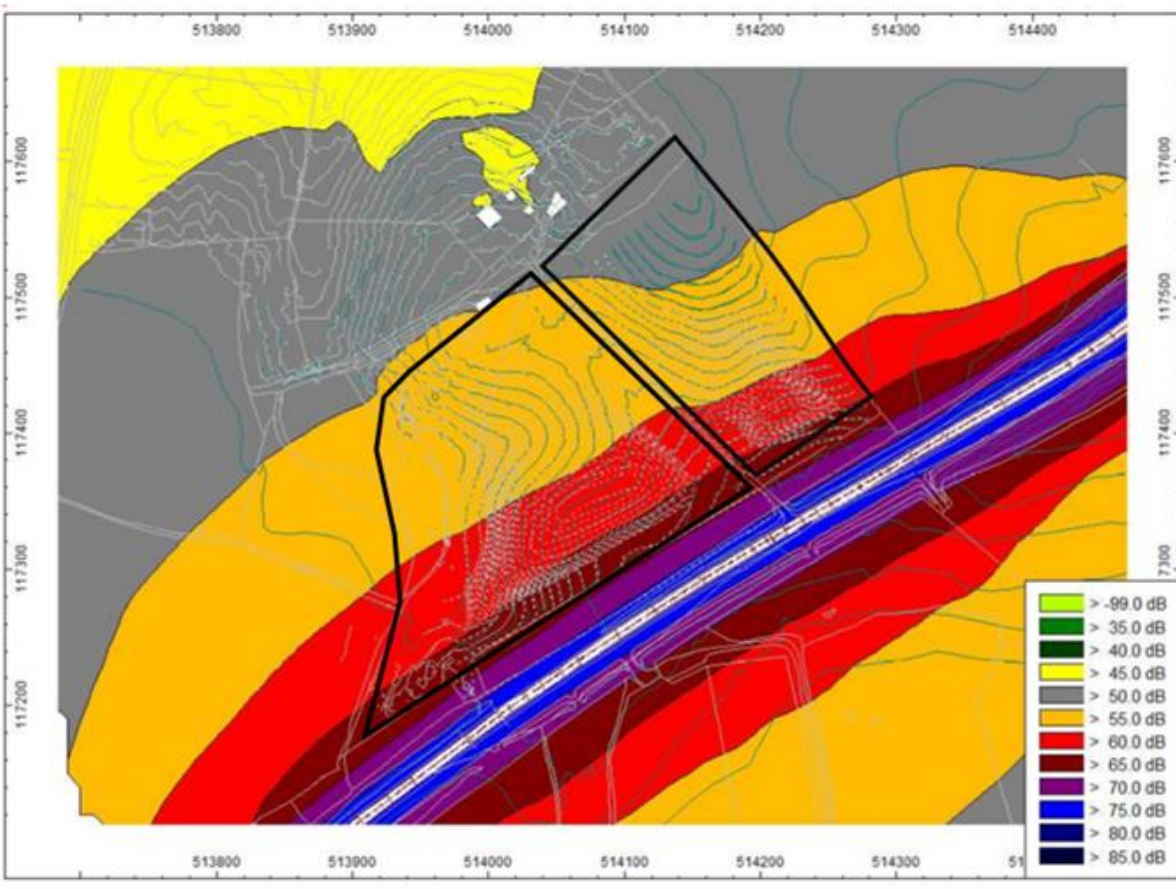
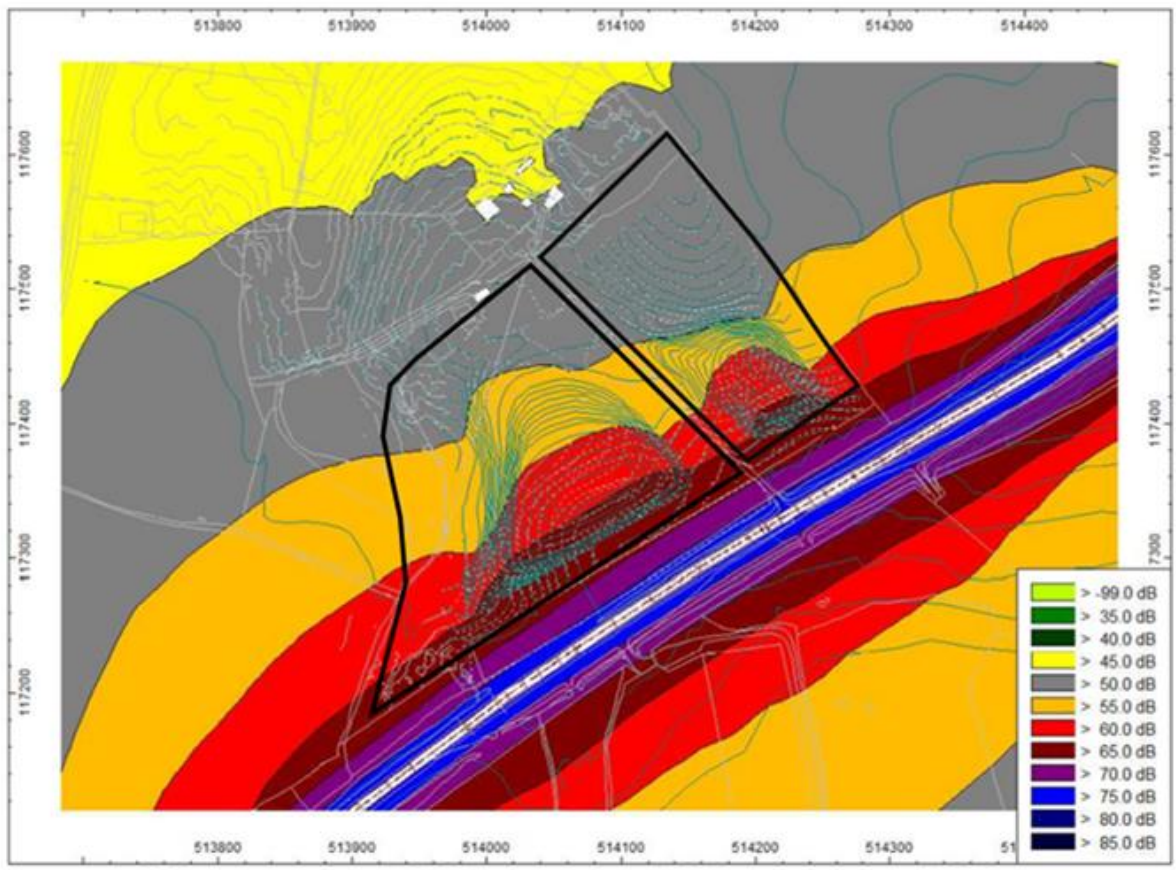
Please accept my apologies for the delayed response to this application. It has taken some time to coordinate a response in consultation with colleagues in Environmental Health.

I note the proposal is for the importation of ~110,000m<sup>3</sup> of inert waste to land south-east of Hooklands Farmhouse, arranged in two bunds to the respective west and east of the existing private access to Hooklands Farmhouse. The justification advanced for the importation/regrading operations include that the grant of consent would provide necessary capacity for the disposal of inert waste, but would additionally provide benefits to occupiers of Hooklands Farm in alleviating perceived noise and air pollution originating from the A24.

The District Council will offer no comments in respect waste capacity and considers your Authority better placed to assess the justification advanced for the proposed operations in this regard. The District Council, similarly, will not offer its own comments in respect of the likely effects of development upon landscape character and appearance, the significance of heritage assets, the health/integrity of trees and woodland, highway safety and operation or upon protected and priority species noting that the views of a range of relevant consultees have already been sought in respect of these considerations.

#### Noise Disturbance:

The Noise Impact Assessment (NIA) provided in support of the proposed operations models a negligible improvement in sound-levels at Hooklands Farm as a consequence of the proposed bunds, predicted as a -2dB LAeq (16hr) reduction at first floor level and -1dB LAeq (16hr) at ground floor level. As acknowledged within the NIA, the degree of improvement is likely limited by the non-contiguous nature of proposed bunds (which retain the existing access to Hooklands Farm), the distance of Hooklands Farm to the proposed bunds and their limited extent; which would fail to contain noise emanating from the A24 to the respective south-west and north-east as best illustrated on the noise-contour models included within the NIA (excerpted below for reference).



The submitted NIA does not discuss and/or attempt to characterise the significance of existing noise measurements/disturbance to occupiers of Hooklands Farm in relation to the World Health Organisation (WHO) Guidelines for Community Noise, though, it is noted that average measurements at Table 3 to the NIA for location MP1 do not suggest that existing noise levels exceed Guideline levels such as to indicate that existing occupiers are exposed to serious levels of noise disturbance. While, therefore, the proposed operations are likely to provide a minor improvement in sound-levels at Hooklands Farm, it is not considered that such an improvement would prove significant in acoustic terms.

The conclusions of the NIA in respect of the likelihood of adverse effect upon nearby occupiers as a consequence of construction movements/activity are accepted, though, operations of this scale are considered to necessitate restrictions on delivery/construction hours to ensure activity is limited to acceptable hours, that neighbouring occupiers are afforded respite for delivery/construction operations and to ensure best practice control/management of noisy activity. In the event that your Authority is minded to grant consent, therefore, it is recommended that conditions are included restricting deliveries/activity to 07:30-17:00 Monday-Friday, 08:00-13:00 Saturdays and at no times on Sundays, bank or public holidays and requiring the submission and approval of a noise management plan (seeking the use of white noise (broadband) reversing alarms for mobile plant).

#### Air Quality:

An Air Quality Assessment (AQA) has been provided in support of the proposals. At section 4.4 the AQA advances a baseline position at the application site, indicating that pollutant concentrations for NO<sub>2</sub>, PM<sub>10</sub> and/or PM<sub>25</sub> are well-below objective levels both previous and subsequent to the proposed development on the basis of desktop modelling. While the AQA does advance at section 6.2 that the proposed operations could act to block the emissions pathway between vehicles on the A24 and Hooklands Farm, this is acknowledged as unquantifiable, with the air-quality benefits of development noted to be represented as 'perceived' benefits; including blocking the views of traffic on the A24. Given the setting of the application site, some distance from the A24 and separated by vegetation, it is considered unlikely occupiers of Hooklands Farmhouse are exposed to concerning levels of NO<sub>2</sub>, PM<sub>10</sub> and/or PM<sub>25</sub>, or that the proposed operations would provide any significant improvement in air-quality conditions.

In respect of the likely effects of proposed operations beyond the site, it is not considered that reliance upon Storrington monitoring tube data for the period of 2017-2021 is appropriate. Traffic levels, and resultant pollutants, in 2020-2021 were reduced as a consequence of the Covid-19 pandemic. The general trend of improving air-quality conditions described in the AQA, therefore, may not be reflective of current conditions. It is considered that more recent data is necessary to establish existing conditions at the Storrington Air Quality Management Area and to verify the conclusions of the AQA.

In the event that your Authority were minded to grant consent, Construction Environment Management Plans (CEMPs) will be required to regulate and mitigate the impacts of dust emanating from proposed operations. CEMPs, in addition, should identify expected construction traffic routes and avoid routing via the Storrington Air Quality Management Area where a concern remains in respect of NO<sub>2</sub> concentrations and the likely adverse effects of additional HGV movements.

#### Imported Soils:

Notwithstanding the inert nature of proposed importation, in the event that your Authority were minded to grant consent, the District Council recommends the inclusion of conditions requiring the

provision of prior-chemical tests and associated verification reports for imported soils prior to initial importation such as to establish the absence of contamination and risk to human health and the wider environment.

Other Matters:

You are likely aware that the site falls within the Sussex North Water Supply Zone, as subject of the Natural England 'Position Statement' of September 2021. Prior to a prospective grant of planning permission, you will either need to screen out the possibility of significant effect upon the Arun Valley SAC, SPA and Ramsar sites in respect of demand for mains-water resources, or otherwise, first, undertake an appropriate assessment pursuant to Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

I hope these comments are of assistance. If it would prove beneficial to discuss please don't hesitate to contact me.

Kind regards,  
Giles