






Callidus Transport and Engineering

CTP Ford Airfield, Alternative Site Access

Transport Statement

on behalf of Grundon Waste Management Ltd

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TABLE OF CONTENTS

1	INTRODUCTION.....	1
1.1	ABOUT THIS REPORT.....	1
1.2	REPORT STRUCTURE.....	1
2	DEVELOPMENT PROPOSALS.....	2
2.1	THE CONSENTED PLANNING SCHEME.....	2
2.2	PROPOSED ALTERNATIVE SITE ACCESS.....	4
2.3	PROPOSED INCREASE TO PERMITTED NUMBER OF HGV MOVEMENTS.....	6
2.4	PROPOSED CHANGES TO PERMITTED DELIVERY HOURS.....	6
3	BASELINE CONDITIONS.....	8
3.1	SITE CONTEXT.....	8
3.2	SUSTAINABLE TRAVEL.....	9
3.3	TRAFFIC.....	10
3.4	ROAD SAFETY.....	11
4	TRAFFIC APPRAISAL.....	13
4.1	INTRODUCTION.....	13
4.2	TRIP GENERATION.....	13
4.3	TRIP DISTRIBUTION.....	15
4.4	TRAFFIC GROWTH.....	15
4.5	LINK ASSESSMENT.....	16
4.6	JUNCTION ASSESSMENTS.....	17
4.7	CUMULATIVE ASSESSMENT.....	21
4.8	CONCLUSIONS.....	23
5	SUMMARY & CONCLUSIONS.....	25
5.1	SUMMARY.....	25
5.2	CONCLUSION.....	27
 APPENDICES		
	APPENDIX A.....	28

FIGURES 28

APPENDIX B	29
CORRESPONDENCE	29
APPENDIX C	30
DRAWINGS	30
APPENDIX D	31
TRAFFIC FLOWS	31
APPENDIX E	32
TRAFFIC MODELLING OUTPUTS (AVAILABLE IN ELECTRONIC FORMAT)	32

FIGURES

FIGURE 3-1: FORD ROAD - TRAFFIC FLOWS BY DAY	10
FIGURE 3-2: FORD ROAD - TRAFFIC FLOW BY HOUR ON THURSDAY 22 ND FEBRUARY	11

TABLES

TABLE 3-1: LOCAL BUS SERVICE	9
TABLE 3-2: SUMMARY OF ROAD ACCIDENTS	12
TABLE 4-1: TRIP GENERATION FOR STAFF (CONSENTED PLANNING SCHEME)	13
TABLE 4-2: TRIP GENERATION FOR TRUCKS (CONSENTED PLANNING SCHEME).....	13
TABLE 4-3: TRIP GENERATION FOR STAFF (NEW PLANNING SCHEME 2016).....	14
TABLE 4-4: TOTAL TRIP GENERATION (WORST CASE SCENARIO).....	14
TABLE 4-5: TEMPRO GROWTH FACTORS	16
TABLE 4-6: LINK ASSESSMENT (THE CONSENTED PLANNING SCHEME)	17
TABLE 4-7: LINK ASSESSMENT (WORSE-CASE SCENARIO).....	17
TABLE 4-8: FORD RD / ALTERNATIVE SITE ACCESS.....	19
TABLE 4-9: CROOKTHORNE ROUNDABOUT – 2017 WITH AND WITHOUT DEVELOPMENT	20
TABLE 4-10: CROOKTHORNE ROUNDABOUT – 2024 WITH AND WITHOUT DEVELOPMENT	21
TABLE 4-11: HOBBS BARN WTS/ MRF – FORECAST TRIP GENERATION.....	22
TABLE 4-12: CROOKTHORNE ROUNDABOUT – 2024 CUMULATIVE ASSESSMENT	23

1 INTRODUCTION

1.1 About this Report

- 1.1.1 Callidus Transport and Engineering Ltd (the consultant) has been commissioned by Grundon Waste Management Ltd (the client) to provide transport and highways advice for a forthcoming planning application to revise the existing consented access arrangements for the Circular Technology Park (CTP), Ford Airfield, Arundel.
- 1.1.2 Grundon intend to submit a planning application for a Southern Link Road (SLR) that links the CTP with the access road to the Viridor site to the south. All access and egress to the CTP would therefore be from the existing Viridor priority junction with Ford Road. The site's location is shown in Appendix A, Figure 1. This figure also illustrates the revised proposals, which are the subject of this report, for access to the CTP at Ford Airfield.
- 1.1.3 The Local Planning Authority is Arun District Council, but the determining authority for the waste related planning application is West Sussex County Council (WSCC).
- 1.1.4 This report forms the Transport Statement (TS) that has been prepared to accompany the planning application for the SLR for the CTP, Ford Airfield. The content and scope of the TS have been highlighted to the Highways Authority, who is also WSCC, through an email to the Highways Case Officer on the required transport scope of work. This correspondence is contained in Appendix B.
- 1.1.5 The TS has been prepared in line with the recommendations set out in the National Planning Policy Framework, Planning Practice Guidance on Travel Plans, Transport Assessments and Statements in decision making' (DCLG 2014).

1.2 Report Structure

- 1.2.1 After the introductory chapter, the report contains the following chapters:
- Chapter 2 describes the development proposals;
 - Chapter 3 reports on the baseline conditions;
 - Chapter 4 outlines the traffic appraisal work undertaken; and
 - Chapter 5 summarises the report and provides a conclusion.

2 DEVELOPMENT PROPOSALS

2.1 The consented planning scheme

- 2.1.1 Grundon Waste Management Ltd previously submitted a planning application in October 2013 for a waste treatment facility at the new CTP, on the former 'Top Block' concrete block manufacturing site at Ford, West Sussex (Application No. WSCC/096/13/F). The CTP at Ford Airfield received planning consent (subject to conditions) on 9th January 2015.
- 2.1.2 The consented planning scheme consists of the development of a waste treatment facility to include a Reception/ Pre-treatment Facility/ Materials Recovery Facility (MRF) and Residual Waste Treatment facility creating energy from waste through Gasification. The site is expected to provide new employment for approximately 60 full time equivalent staff, once fully commissioned and operational.
- 2.1.3 The proposed facility would handle up to 200,000 tonnes of largely Commercial and Industrial waste per annum. The MRF would allow approximately 60,000 tonnes per annum of materials received to be recycled, the residual fraction (estimated at 140,000 tonnes of waste per annum) being processed by a Residual Waste Treatment Facility primarily to produce electricity, but also with the potential for heat generation.
- 2.1.4 The access arrangements under the consented scheme proposed separate entry and exit points from Rollaston Park and Ford Road respectively. This arrangement enabled a one-way circulatory route for all vehicles using the site. Vehicles would arrive at the site via Yapton Road and Rollaston Park, and depart from the site via Ford Road using the existing service road.

Local Policy Context

- 2.1.5 The site has been allocated in the West Sussex Waste Local Plan (adopted April 2014) as a strategic waste management site handling up to 250,000 tonnes of waste per annum. The following transport and highways principles are highlighted in the Adopted Plan:

- Assessment of impacts on the amenity of users of public rights of way and possible mitigation and enhancement required;
- Assessment of impact (e.g. traffic) on the amenity of dwellings to the north east and south west and possible mitigation required;
- The cumulative impacts (of traffic etc.) on the environment and local communities to be satisfactorily addressed and mitigated as required, taking into account all existing, permitted, allocated, or proposed development within the wider area;
- Assessment of the possible closure of the existing access north of Rodney Crescent and the use of an alternative access to the site from Ford Road;
- Assessment of impact of additional HGV movements on highway capacity and road safety, including at the Church Lane and A259 junction and possible mitigation required; and
- A routeing agreement requirement to ensure that vehicles enter and exit via Ford Road to the south, and not to or from the A27 to the north. Access via Rollaston Park/B2233 for HGVs should also be prevented.

2.1.6 A Transport Assessment undertaken by West Sussex County Council to provide evidence to support the Waste Local Plan examined the operation of the local highway network assuming the site generated 240 vehicles per day. It concluded the following:

- The Ford site was classified as 'green' from a highways perspective. This assumed that any access onto Ford Road would include a routeing agreement to ensure vehicles enter and exit via Ford Road to the south.
- The Church Lane / A259 roundabout was identified as having peak hour traffic capacity problems. The report goes on to say that '*however, it must be highlighted that the MRF was not suggested to generate significant traffic during the traditional peak hour period*'.
- The assessment assumed that 25-26 two-way HGV movements could occur during the traditional AM peak hour period of 08:00-09:00.

- The report concludes this it *'is not anticipated to constitute a significant change to the capacity of the Church Lane/ A259 roundabout during such sensitive times when traffic levels are usually highest on the LRN would be experienced'*.
- Taking into account development at Hobbs Barn the report anticipated the cumulative impact for the Church Lane/ A259 roundabout to equate to a potential 30 two-way HGV movements in any one hour. This was not anticipated to constitute a significant change to the capacity of this junction.

2.2 Proposed alternative site access

2.2.1 The current planning application is to replace the approved access with a SLR, which links the CTP with the access road to the Viridor site to the south. All access and egress to the CTP would therefore be from the existing Viridor priority junction with Ford Road.

2.2.2 Appendix A, Figure 1 illustrates the revised proposal for access to the CTP at Ford Airfield.

Rationale

2.2.3 The benefits of this alternative site access arrangement include:

- a single point of access;
- greater efficiency of operations;
- improved local amenity;
- use of higher order roads with an established, high quality access point; and
- conformity with the Adopted West Sussex Waste Local Plan.

SLR

2.2.4 The SLR will cater for all the development traffic arriving and departing the CTP at Ford Airfield. All access and egress would be from the south east corner of the site, with the SLR providing a connection to the access road for Viridor site and waste water treatment works to the south via a priority junction.

2.2.5 The illustrative alignment of the proposed SLR is shown in Appendix C, Drawing No.

TE/1093/312. The SLR will be a private road and will therefore not form part of the adopted highway. However, it is designed to an appropriate standard with a road width of 7.3 metres and a 2.0 metre footway on the west side of the carriageway. The route is approximately 180m in length. It has a near straight alignment and there are no active frontages along its route.

2.2.6 Drawing No. TE/1093/312 demonstrates that the road link is of sufficient width to accommodate all potential vehicles. The drawing shows the swept paths of two 3-axle articulated HGVs (at the maximum legal length of 16.5 metres) with appropriate space to pass at all points along the SLR.

2.2.7 The priority junction with the access road to the south is designed to appropriate highways standards. The junction has good sightline visibility to the left and right from the minor arm. This connects into the access road to the waste water treatment works to the west and a junction with the established Viridor access to the south. The inset in Drawing No. TE/1093/312 demonstrates that the priority junction can safely accommodate turning movements for two 16.5 m articulated HGVs.

Ford Road/ Viridor site access

2.2.8 This junction forms the main point of access from the site to the strategic road network. The Viridor site access on Ford Road is located approximately 0.9 kilometres south of Ford Railway Station and approximately 1.7 kilometres north of the A259 Crookthorne Roundabout.

2.2.9 It is a right-turn ghost island junction, with a flared single lane approach on the minor arm designed to a high standard. Reference to the Transport Assessment accompanying the planning application for the Viridor site¹ indicates that the highways design standard set for the visibility splays were 215m, appropriate for a road with a 60 mph speed limit as advised in the DfT's TD 42/95 (Geometric Design of Major/ minor priority junctions).

¹Babtie Environmental Statement (2004): Planning Application for Ford Materials Recycling Facility, Ford Airfield (Applicant: Viridor Waste Management Limited)

2.3 Proposed increase to permitted number of HGV movements

2.3.1 An increase in the number of HGV movements visiting the CTP site is also sought as part of these proposals.

2.3.2 The consented planning scheme limits HGV movements to 60 HGVs entering and 60 HGVs exiting the site Mondays to Fridays and 30 HGVs entering and 30 HGVs exiting the site on Saturdays.

2.3.3 It is proposed that HGV movements would increase as follows:

- No more than 120 HGVs can enter and no more than 120 HGVs can exit the site Mondays to Fridays
- No more than 60 HGVs can enter and no more than 60 HGVs can exit the site Saturdays.

2.3.4 The proposed increase in HGV movements reflects a worst-case scenario (albeit based on realistic assumptions) that is required to ensure that potential impacts associated with the operation of the site are appropriately assessed. Further details on these assumptions are provided in Chapter 3 (Proposed Development) of the ES Addendum.

2.4 Proposed changes to permitted delivery hours

2.4.1 A variation to the permitted delivery hours at the CTP Ford Airfield is also sought as part of these proposals.

2.4.2 The consented planning scheme limits delivery hours to 0730-1700 hours Monday to Friday and 0800-1300 hours on Saturdays.

2.4.3 It is proposed that delivery hours are extended as follows:

- 0600 – 2000 on Monday to Friday
- 0800 – 1800 on Saturday
- No deliveries on Sunday/ Bank Holidays

2.4.4 The new hours for deliveries are proposed in recognition of the fact that:

- The consented accesses north of Rodney Crescent and via Rollaston Park will no longer be required for vehicular access.
- All site vehicular access and egress will be from the existing Viridor priority junction with Ford Road.
- The proposed extended delivery hours for the Ford CTP would be fully within the delivery hours permitted at the Viridor Site.

3 BASELINE CONDITIONS

3.1 Site Context

- 3.1.1 The site forms part of the former Ford Airfield, and is located some 500m west of Ford Road/ Station Road. Ford Road is an unclassified road and is moderately trafficked. It connects the A259 with the A27 at Arundel to the north. Throughout much of its length, Ford Road and Station Road have 40 mph speed restrictions. It has a footway along its entire length, mostly on the west side and is mostly unlit.
- 3.1.2 Station Road has a controlled railway level crossing approximately 1 km to the north of the Viridor site access. This is also the location of Ford Railway Station. This is a busy railway line carrying trains along the south coast railway route between Southampton and Brighton. Therefore, the level crossing is in regular operation.
- 3.1.3 Ford Road to the south of the site is generally straight and has limited frontages. Nelson Row is a residential street served by a service road to the east of Ford Road and located approximately 120 metres south of the existing Viridor site access. It is provided with three access points including an 'entry only' at its northern end and 'exit only' at its southern end. There are 23 residential properties along Nelson Row with the frontages of the houses set back about 25m from the carriageway eastern edge of Ford Road.
- 3.1.4 Ford Open Prison is located approximately 550 metres south of the existing Viridor access and is situated on either side of the road with a pelican crossing joining the two sites. There are also several accesses to sites, mostly commercial and light industrial, to the west of Ford Road. At a point some 80 metres north of the junction of Ford Road with the Rudford Industrial Estate there is an existing pedestrian crossing.
- 3.1.5 The southern end of Ford Road is known as Church Lane. The junction of Ford Road with Horsemere Green Lane and Church Lane is located approximately 1.0 kilometres south of the existing Viridor access.
- 3.1.6 Church Lane forms a roundabout junction with the A259 (known as Crookthorn Lane

at this location) at its southern extent. This junction, known as the Crookthorne Roundabout, is located 1.7 km to the south of the Viridor site access on Ford Road.

- 3.1.7 The A259 is a strategic route and links Chichester with Worthing via Bognor Regis and Littlehampton. The A259 between the junction of Yapton Road and Ford Road has a 40mph speed restriction along its entire length. It is a heavily trafficked road with no frontages along this section. A footway/ cycleway runs along the north side of the A259 but comes to an end at the Yapton Road junction.

3.2 Sustainable Travel

- 3.2.1 The availability of bus services is shown in Table 3-1, along with the routes they take and their frequency. The nearest bus stops on Ford Road are at Nelson Row, just south of the Viridor site access on Ford Road.

Ford Road	From	To	Frequency
615 Compass Travel	Poling	Littlehampton	1 / day return
X4 Compass Travel	Bognor Regis	Arundel	1 / day return

Table 3-1: Local Bus Service

- 3.2.1 The nearest railway station is Ford Station approximately 1 km from the site access to the north on Ford Road. This provides rail services along the south coast and connections to the wider rail network.
- 3.2.2 There are limited designated cycling routes in the vicinity of the site. However, Ford Road is relatively flat with good visibility and is an appropriate route for competent cyclists. The A259 has an off-road shared pedestrian and cycle route along it from the east and as far as the junction with Yapton Road. .
- 3.2.3 South Coast Cycle Route 2 connects to Church Lane from the junction with Horsemere Green Lane approximately 1.0 kilometres south of the Viridor access. This section of Route 2 runs from Burndell, along Burndell Road, Yapton Road and Horsemere Green Lane to Climping. Route 2 then travel south along Church Lane, over the A259 Crookthorne Roundabout, to Crookthorne Lane where it continues west on to Littlehampton.

3.3 Traffic

3.3.1 Traffic surveys were originally undertaken in March 2013 to support work on the consented planning scheme. New traffic surveys were undertaken in February 2018, including a 7-day Automatic Traffic Counter (ATC) survey on Ford Road between Monday 19th February and Sunday 25th February. This survey was located at a point on Ford Road between the Viridor site access and the northern entrance to Nelson Row.

3.3.2 An earlier traffic survey was undertaken in December 2015 to support the transport work for this application. This was a Manual Classified Count at the Ford Road/ Viridor site access junction. This survey provided the base traffic flows for the site access junction assessment undertaken in Chapter 4.

3.3.1 The ATC data collected in February 2018 highlights that Thursday was the busiest day of the sample week.

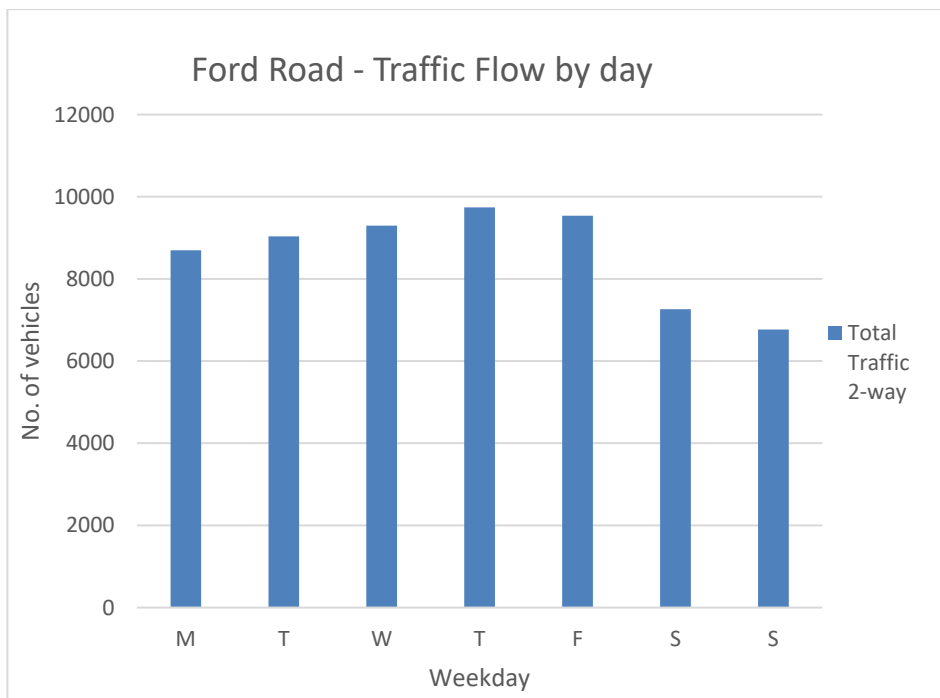


Figure 3-1: Ford Road - Traffic flows by day

3.3.2 Traffic data from the Thursday count has been sampled and is shown in the graphs below.

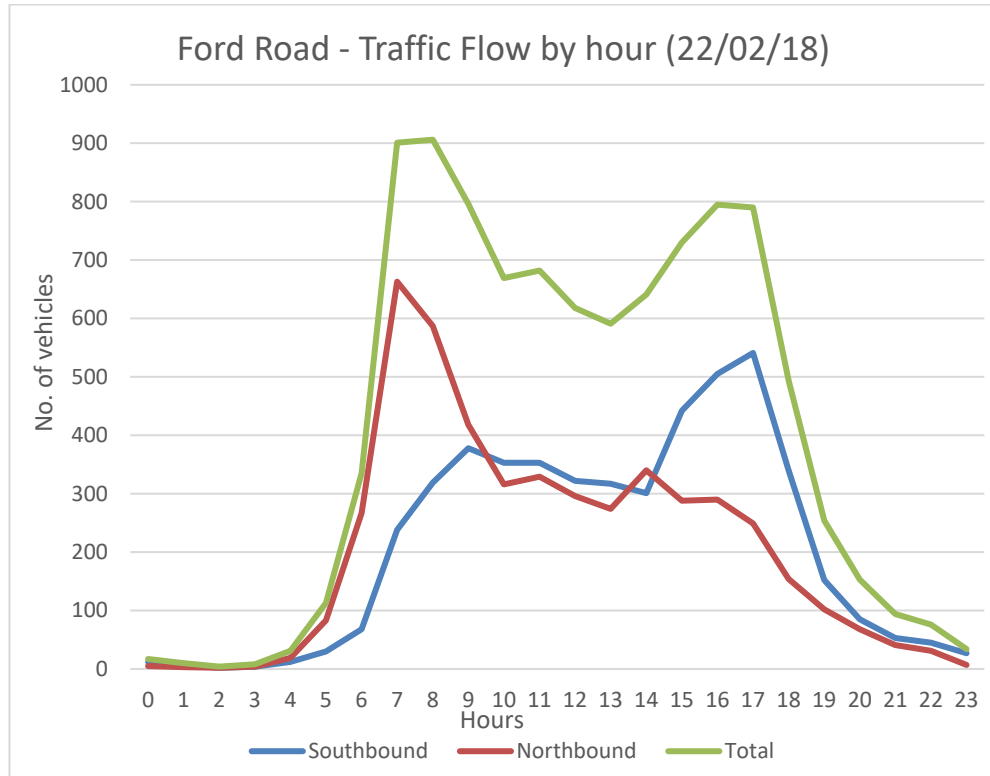


Figure 3-2: Ford Road - Traffic flow by hour on Thursday 22nd February

3.3.3 Ford Road carries a maximum hourly flow of 906 vehicles. The data for Ford Road shows a tidal pattern with very pronounced peak traffic periods. In the morning the northbound flows are higher whereas in the afternoon the southbound flows are higher. This suggests that there are a lot of commuter trips that start from the coastal area and travel north to get access to the A27 for onward trips east and west to employment destinations. The ATC data confirms that the AM peak period is 0800-0900 and the PM peak period is 1700-1800.

3.4 Road Safety

3.4.1 As was reported in the TA for the CTP consented planning scheme, the analysis of accident records for Ford Road was as follows:

- Personal Injury Accident (PIA) data was obtained from the Sussex Safer Roads Partnership for the period 01 June 2008 to 31 May 2013.
- Analysis was undertaken of PIA records for Ford Road between its junction with the A27 in the north and the A259 to the south. The junction with the A259 was excluded from the analysis.

3.4.2 A summary of the analysis is shown in Table 3-2.

	Ref.	Date	Easting	Northing	Location	Severity	Casualties	Vehicles						
								Ped	PC	MC	Car	LGV (3.5-7.5t)	MGV (over 7.5t)	
1	904531	23/06/09	500128	102813	Ford rd 419m south of Horsemere Green La.	Slight	1		1		1			
2	907187	29/09/09	500204	102550	Ford Rd j/w Rudford Industrial Estate	Slight	1			1	1			
3	1004387	04/07/10	500147	104141	Station Rd, Ford Lane	Slight	1				1			
4	1005860	05/09/10	500173	104177	Station Rd, Ford Lane	Slight	1			1				
5	1100280	13/01/11	500191	104188	Station Rd, Ford Lane	Slight	1				2			
6	1205568	16/10/12	500282	102422	Church Lane at jct Horsemere Green	Slight	1				2			
7	1206085	15/11/12	500419	102054	Church Road north of A259 Crookthorne Lane	Slight	2				4			
8	1206449	04/12/12	500078	103685	Ford Rd j/w Ford Lane	Slight	1				2			
TOTALS							9	0	1	2	13	0		

Table 3-2: Summary of road accidents

3.4.1 The table shows that there have been 8 injury accidents in the five year period resulting in 9 casualties. There are no specific locations where these accidents are concentrated and no discernible pattern in the results. The majority of accidents involve cars with most of these accidents being collisions between two vehicles. All accidents were classified as 'slight'.

3.4.2 Pedestrians, cyclists and motorcyclists can be classified as vulnerable road users. There were no accidents resulting in an injury to a pedestrian, 1 accident involving an injury to a cyclist and 2 accidents resulting in an injury to a motorcyclist.

3.4.3 Any amount of accidents can be considered to be too many. However, given the number of traffic movements, motorised and non-motorised, that take place along Ford Road each year, these accident figures may be considered to be low.

3.4.4 Overall, Ford Road can be considered to be a safe road for all users including pedestrians and cyclists.

4 TRAFFIC APPRAISAL

4.1 Introduction

4.1.1 This chapter considers the implications of the SLR revised access proposals for the CTP Ford Airfield on the surrounding road network. The traffic appraisal work has built on the analysis undertaken within the TA for the consented planning scheme. 24 hour link flows have been considered for a high level analysis. At a more detailed level, junction modelling has been undertaken for peak hours for general traffic (0800-0900 and 1700-1800) as this has been considered as the period when the operation of the surrounding road network is most sensitive.

4.2 Trip generation

The consented scheme

4.2.1 The trip generation estimates below are those used for the consented planning scheme for the CTP Ford Airfield and are based on the following parameters:

- Number of trucks daily = 120 trips (two-way).
- Hours of operation = Mon to Fri 0730-1700; Sat 0800-1300.

4.2.2 Table 4-1 sets out the anticipated trip generation for the CTP staff under the consented planning scheme.

Staff	IN	OUT	TOTAL
AM (0800-0900)	0	0	0
PM (1700-1800)	0	8	8
Daily	47	47	94

Table 4-1: Trip generation for staff (consented planning scheme)

4.2.3 Table 4-2 sets out the anticipated trip generation for truck arrivals and departures for the CTP under the consented planning scheme.

Trucks (consent)	IN	OUT	TOTAL
AM (0800-0900)	6	6	12
PM (1700-1800)	0	0	0
Daily (0730-1700)	60	60	120
SAT (0800-1300)	30	30	60

Table 4-2: Trip generation for trucks (consented planning scheme)

The proposed scheme

4.2.4 The trip generation estimates below set out the details of the proposed new

planning scheme for the CTP Ford Airfield. For assessment purposes, a worst case scenario has been tested which assumes 240 medium and heavy goods vehicle movements per day. The scenario stems from the assumptions used for the Ford site in the Transport Assessment produced by West Sussex Waste Local Plan, when assessing the suitability of the site as a Strategic Waste Site Allocation. This scenario ensures a robust assessment and allows for more flexibility in the types of vehicles used to transport waste to the site than was previously assumed under the consented planning scheme.

4.2.5 This new scheme includes the following parameters:

- Annual CTP waste throughput = the same as the consented planning scheme.
- Numbers of trucks daily = estimate 240 trips (two-way). This will allow more flexibility in the size of vehicles used for deliveries.
- Hours of operation = Daily 0600-2000; Saturday 0800-1800; no deliveries on Sunday/ Bank Holidays.

4.2.6 Table 4-3 sets out the anticipated trip generation for the CTP staff under the proposed planning scheme (note this remains unchanged from the consented planning scheme).

Staff	IN	OUT	TOTAL
AM (0800-0900)	0	0	0
PM (1700-1800)	0	8	8
Daily	47	47	94

Table 4-3: Trip generation for staff (new planning scheme 2016)

4.2.7 For assessment purposes, Table 4-4 sets out a 'worst case' scenario for truck arrivals and departures for the CTP under the proposed planning scheme.

Trucks (worse case)	IN	OUT	TOTAL
AM (0800-0900)*	9	9	17
PM (1700-1800)*	9	9	17
Daily (0600-2000)	120	120	240
SAT (0800-1800)	60	60	120

Table 4-4: Total trip generation (worst case scenario)

Note: * Due to rounding within the calculations the hourly trips would equate to a total of 252 truck movements daily

4.3 Trip Distribution

4.3.1 As highlighted throughout this report, all access and egress to the CTP is now proposed to be from the existing Viridor priority junction with Ford Road. The trip distribution assumptions for the CTP-related traffic therefore need to be revised from those put forward under the consented planning scheme. Under these new proposals, all inbound traffic to the CTP will now be via the existing Viridor access.

4.3.2 The distribution of trips for the CTP consented planning scheme were derived from an analysis of Census journey to work data for the Yapton Ward (as shown within the Callidus TA for the CTP Ford Airfield, October 2013). This analysis has now been revised to take account of current proposals to distribute all development traffic to Ford Road via the SLR.

4.3.3 The assignment of employees' car trip now assumes that arrivals will be as follows:

- Ford Road to / from the north: 10%
- Ford Road to / from the south: 90%
 - A259 to/ from the east: 45%
 - A259 to / from the west: 45%

4.3.4 As with proposals within the consented planning scheme, there will be no truck movements to the north of the site access on Ford Road. The assignment of truck movements for the CTP now assumes that arrivals will be as follows:

- Ford Road to / from the south: 100%
 - A259 from the east: 50%
 - A259 from the west: 50%

4.3.5 The resulting traffic flows on the local road network, 'with' and 'without' the development, are shown in Appendix D. The base traffic flows for the existing Viridor site access junction are derived from a new Manual Classified Count undertaken in December 2015.

4.4 Traffic Growth

4.4.1 The traffic growth on the surrounding road network has been derived from the DFT's

TEMPRO traffic forecasting programme, which provides traffic growth factors at a local level. It is then standard practice to use these factors to adjust national traffic growth rates from the National Transport Model (NTM).

4.4.2 Forecast growth levels for the district of Arun have been used. Where required, the surveyed traffic flows have been growthed to the base years of 2018, the intended year of opening, and 2024, the future year assessment used for the consented scheme.

4.4.3 The use of this technique ensures that planned and committed development, as well as associated infrastructure, is taken into account in the area.

4.4.4 The growth factors used are shown in Table 4-5.

	AM	PM	Ave. weekday
2013-2017	1.0474	1.0496	1.0509
2016-2018	-	-	1.0399
2013-2024	1.1742	1.174	n/a
2015-2024	1.1611	1.1694	n/a

Table 4-5: TEMPRO Growth Factors

4.5 Link Assessment

4.5.1 A comparison between the existing traffic flows and the proposed development traffic on key links on the local road network has been made. The results for the consented planning scheme are shown in Table 4-6 and for the worst case scenario in Table 4-7.

4.5.2 The IEMA² guidelines on Environmental Assessment of Road Traffic set out the following 'rules of thumb' assessment criteria:

² Environmental Assessment of Road Traffic (Institute of Environmental Management & Assessment)

- Rule 1: Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
- Rule 2: Include any other specifically sensitive areas where traffic flows will increase by 10% or more.

2018	Existing		Development		% change		Notes: PSVs
	All vehicles	HGVs PSVs	All vehicles	HGVs	All vehicles	HGVs	
A259*	27013	529	147	100	0.5%	18.9%	DfT site no. 6833 - 2016 AADF data
Ford Road	9742	1064	294	200	3.0%	18.8%	Surveyed February 2018

NOTES: * this is the A259 west of the Crookthorne roundabout

Table 4-6: Link Assessment (the consented planning scheme)

4.5.3 The table shows that for the consented planning scheme, the percentage increase in 'All Vehicles' is much lower on all links, at 3.0% or less, than the IEMA threshold under Rule 1 or Rule 2. The percentage increase in HGVs on the key links is about 19%, which is below the IEMA threshold under Rule 1.

4.5.4 Table 4-7 below shows the outcome of a link assessment under a worst case scenario of 240 truck movements daily.

2018	Existing		Development		% change		Notes: PSVs
	All vehicles	HGVs PSVs	All vehicles	HGVs	All vehicles	HGVs	
A259	27013	529	167	120	0.6%	22.7%	DfT site no. 6833 - 2016 AADF data
Ford Road	9742	1064	334	240	3.4%	22.6%	Surveyed February 2018

Table 4-7: Link Assessment (worse-case scenario)

4.5.5 The table shows that for the worst case scenario, the percentage increase in 'All Vehicles' is much lower on all links, at 3.4% or less, than the IEMA threshold under Rule 1 or Rule 2. The percentage increase in HGVs on the key links is about 23%, which is below the IEMA threshold under Rule 1.

4.6 Junction assessments

4.6.1 Junction modelling of key junctions in the local road network has been undertaken using PICADY software for priority junctions and ARCADY software for roundabouts

(this is industry standard software for modelling these types of junctions). The following periods have been modelled as they are considered to be the most sensitive to general traffic:

- i. 0800-0900 (base traffic 2017 and 2024 with and without development)
- ii. 1700-1800 (base traffic 2017 and 2024 with and without development)

4.6.2 In some cases (listed below), results for 2024 (10 years from the original planning application) only have been shown. The traffic flows are higher in 2024 and, therefore, if a junction can be shown to operate satisfactorily in 2024, then the same conclusion can be applied to 2017 (the year of opening).

4.6.1 A value of Ratio of Flow to Capacity (RFC) greater than 0.85 (85%) shown in the results below would indicate that the junction is operating over its design capacity. It is stated in TA23/81 that:

Queuing should not occur in the various turning movements in the chosen design year peak hour in 5 out of 6 cases (schemes) if a maximum RFC ratio of about 85% is used, or 39 out of 40 cases (schemes) if a maximum ratio of about 75% is used³.

Ford Road / Viridor site access

4.6.2 Table 4-8 shows the forecast traffic capacity of the Ford Road/ Viridor site access, 'with' and 'without' development in forecast year of 2024. This junction is now proposed to accommodate all inbound and outbound traffic for the development site, with all trucks distributed south on Ford Road.

4.6.3 The results in Table 4-8 demonstrate that the junction is forecast to operate well within its design capacity in 2024 with the CTP development traffic added. As a result, it is not necessary to test for the year of opening i.e. 2017 as this can safely be assumed to be below the traffic levels projected for 2024.

4.6.4 It can be concluded that the junction will support the development traffic without

³ Design Manual for Roads and Bridges Volume 6 Section 2 TA23/81

congestion or delay.

	2024 Base			2024 Base + Consented Scheme			2024 Base + Worst Case		
	RFC	End Q	Delay (veh.min / segment)*	RFC	End Q	Delay (veh.min / segment)*	RFC	End Q	Delay (veh.min / segment)*
AM Peak Hour (0800-0900)									
B-A	0.017	0.02	0.3	0.092	0.10	1.5	0.111	0.12	1.8
B-C	0.034	0.03	0.5	0.011	0.01	0.2	0.011	0.01	0.2
C-B	0.023	0.02	0.3	0.023	0.02	0.3	0.023	0.02	0.3
PM Peak Hour (1700-1800)									
B-A	0.054	0.06	0.8	0.116	0.13	1.9	0.133	0.15	2.3
B-C	0.011	0.01	0.2	0.011	0.01	0.2	0.012	0.01	0.2
C-B	0.023	0.02	0.3	0.023	0.02	0.3	0.023	0.02	0.3

A: Ford Road n'bound; B: Viridor site access; C: Ford Road s'bound

Note: Due to rounding up of hourly trips this calculations is based on a scheme that would equate to a total of 252 truck movements daily.

Table 4-8: Ford Rd / Alternative site access

A259 Crookthorne Roundabout

- 4.6.5 The results in Table 4-9 below show the forecast traffic capacity of the Crookthorne roundabout 'with' and 'without' development in the year of opening of 2017.
- 4.6.6 The table shows that in the morning peak hour (0800-0900), arm D (A259 eastbound) is at capacity (with an RFC of 0.974 'without' the development). This is made marginally worse by the addition of the development traffic under both the consented planning scheme and worst case scenario, which result in increasing the queue by between 2 or 3 vehicles.
- 4.6.7 The table shows that in the evening peak hour (1700-1800), arm B (A259 westbound) is just at capacity. This is made marginally worse by the addition of the development traffic under both the consented planning scheme and worst case scenario, which result in increasing the queue by no more than 1 vehicle. All other arms of the junction are within capacity.

	2017 Base			2017 Base + Consented scheme			2017 Base + Worst Case		
	RFC	End Q	Delay (veh.min / segment)*	RFC	End Q	Delay (veh.min / segment)*	RFC	End Q	Delay (veh.min / segment)*
AM Peak Hour (0800-0900)									
A	0.406	0.7	10.1	0.420	0.7	10.6	0.427	0.7	11.0
B	0.747	2.9	43.2	0.754	3.0	44.7	0.755	3.0	45.0
C	0.050	0.1	0.8	0.050	0.1	0.8	0.051	0.1	0.8
D	0.974	17.1	230.6	0.983	19.2	254.4	0.986	20.1	265.0

PM Peak Hour (1700-1800)									
A	0.813	4.1	60.0	0.837	4.7	69.2	0.843	4.9	71.9
B	0.851	5.4	80.1	0.861	5.8	85.4	0.863	5.9	87.2
C	0.012	0.0	0.2	0.013	0.0	0.2	0.013	0.0	0.2
D	0.732	2.7	39.8	0.736	2.7	40.7	0.740	2.8	41.4

A: Ford Rd B: A259 westbound C: Crookthorn Lane D: A259 eastbound

Note: Due to rounding up of hourly trips this calculations is based on a scheme that would equate to a total of 252 truck movements daily.

Table 4-9: Crookthorne Roundabout – 2017 with and without development

- 4.6.8 The revised access proposals for the CTP will add a small amount of traffic to arms A, B and D. Arm A has spare capacity to absorb the additional traffic. Arm B has spare capacity in the AM peak hour, but is at capacity in the PM peak hour. Arm D is at capacity in the AM peak hour, but has spare capacity in the PM peak hour. It is clear from the results that 'without' the development east-west movements at the Crookthorne Roundabout are at capacity at peak times. The addition of the development traffic is so small as to be imperceptible, and likely to be less than the daily fluctuations in traffic flow.
- 4.6.9 The results in Table 4-10 show the forecast traffic capacity of the Crookthorne roundabout 'with' and 'without' development in the forecast year of 2024. It can be seen that the findings under the 2017 assessment year are further amplified for the 2024 assessment year, as a result of continued growth in the background traffic.
- 4.6.10 The table shows that in the morning peak hour (0800-0900), arm D (A259 eastbound) is over capacity in the base scenario ('without' development, with an RFC is 1.126). This is made marginally worse under the consented planning scheme, which results in increasing the queue by about 4 vehicles ('with' development, the RFC increases to 1.34). Under the worst case scenario, arm D experiences a queue increase of about 8 vehicles (with' development, the RFC increases to 1.142).
- 4.6.11 The table shows that in the evening peak hour (1700-1800) arms A and B (Ford Road and A259 westbound respectively) are over capacity. The addition of the development traffic for the consented planning scheme results in a forecast increase in the queue on Ford Road of 6 vehicles (the RFC increases to 1.009) and on the A259 westbound of 2 vehicles (the RFC increases to 0.970). Under the worst case

scenario, arm A experiences a queue increase of about 7 vehicles (the RFC increases to 1.015) and on the A259 westbound of about 3 vehicles (the RFC increases to 0.973).

	2024 Base			2024 Base + Consented scheme			2024 Base + Worse Case		
	RFC	End Q	Delay (veh.min / segment)*	RFC	End Q	Delay (veh.min / segment)*	RFC	End Q	Delay (veh.min / segment)*
AM Peak Hour (0800-0900)									
A	0.459	0.8	12.5	0.471	0.9	13.2	0.473	0.9	13.3
B	0.840	5.0	74.4	0.844	5.2	76.5	0.849	5.4	79.1
C	0.068	0.1	1.1	0.068	0.1	1.1	0.069	0.1	1.1
D	1.126	81.7	950.7	1.134	85.7	995.4	1.142	89.5	1038.8
PM Peak Hour (1700-1800)									
A	0.981	16.2	212.2	1.009	21.7	275.1	1.015	23.0	289.6
B	0.962	16.2	222.9	0.970	18.0	244.6	0.973	18.8	254.4
C	0.018	0.0	0.3	0.018	0.0	0.3	0.018	0.0	0.3
D	0.826	4.5	66.7	0.833	4.7	69.9	0.836	4.8	71.0

A: Ford Rd B: A259 westbound C: Crookthorn Lane D: A259 eastbound

Note: Due to rounding up of hourly trips this calculations is based on a scheme that would equate to a total of 252 truck movements daily.

Table 4-10: Crookthorne Roundabout – 2024 with and without development

4.6.12 It is concluded from the above capacity assessments that the difference in terms of traffic impact between the consented planning scheme and the worst case scenario is so small as to be imperceptible. In effect, the traffic impact of greater number of vehicle trips under the worst case scenario is mitigated by extending the hours for permitted deliveries throughout the day.

4.7 Cumulative Assessment

4.7.1 In February 2016, Viridor Waste Management Ltd submitted a planning application (ref. no. WSCC/009/16/F) to vary condition 24 of planning permission F/19/05 for Viridor’s Materials Recycling Facility (MRF) in Ford. The variation to condition 24 is in order to allow for the Ford MRF to be able to accept material from outside of West Sussex. At their Planning Committee meeting in May 2016, members resolved to grant planning permission for this.

4.7.2 The facility is permitted to process up to 100,000 tonnes of recyclable materials per annum, which equates to up to 108 one-way vehicle movements (54 HGVs) per day.

However, the accompanying TS⁴ indicates that since its opening, the MRF has been operating well below its maximum permitted waste throughput, at around 68 HGV movements per day. It is now estimated that the MRF operating at full capacity could generate around 92 one-way vehicle movements (46 HGVs) per day i.e. below the already permitted traffic levels set out in the original planning application for the site. Assuming, the facility were to operate at full capacity, this would equate to an additional 24 one-way vehicle movements (12 HGVs).

4.7.3 The recently approved development proposal at Hobbs Barn is also included in the cumulative assessment scenario (ref. no.: WSCC/067/15/CM). This development uses an area of land to the south of Hobbs New Barn Business Park, on the A259 near Climping, as a waste transfer station (WTS) and materials recycling facility (MRF) managing up to 50,000 tonnes of inert skip waste each year. The Hobbs Barn Transport Assessment⁵ provides the following details with regards to anticipated trip generation:

	Cars		OGV	
	IN	OUT	IN	OUT
AM 0800-0900	1	1	2	5
PM 1700-1800	1	2	4	5
Daily	18	18	56	56

Table 4-11: Hobbs Barn WTS/ MRF – Forecast Trip Generation

4.7.4 The Hobbs Barn TA also provides the following information on the anticipated distribution of trips from the site:

- AM – Eastbound: 63% / Westbound: 37%
- PM – Eastbound: 34% / Westbound: 66%

4.7.5 Table 4-12 shows the forecast traffic capacity of the Crookthorne roundabout under a cumulative assessment scenario 'with' the CTP and new Viridor and Hobbs Barn development traffic added in the forecast year of 2024.

⁴ i-Transport (Feb, 2016): Transport Statement, Ford MRF, Ford (Applicant: Viridor Waste Management Limited)

⁵ Callidus Transport & Engineering Ltd (2015): Transport Assessment, Waste Transfer Station & Materials Recycling Facility, Baird's Business Park, Climping (Applicant: James D Baird Ltd)

	2024 Base + Dev + Cumulative traffic		
	RFC	End Q	Delay (veh.min / segment)*
AM Peak Hour (0800-0900)			
A	0.487	0.9	14.0
B	0.857	5.7	83.4
C	0.070	0.1	1.1
D	1.156	97.0	1123.7
PM Peak Hour (1700-1800)			
A	1.032	27.5	339.0
B	0.980	20.8	277.8
C	0.019	0.0	0.3
D	0.844	5.1	75.1

A: Ford Rd B: A259 westbound C: Crookthorn Lane D: A259 eastbound
 Note: Due to rounding up of hourly trips this calculations is based on a scheme that would equate to a total of 252 truck movements daily.

Table 4-12: Crookthorne Roundabout – 2024 Cumulative Assessment

4.7.6 The result show the same pattern of traffic impacts as identified in paragraph 4.6.8. A comparison between Table 4-10 and Table 4-12 demonstrates that the addition of development traffic related to the new Viridor and Hobbs Barn applications makes little difference to the result of the capacity testing for the Crookthorne Roundabout in the forecast year of 2024.

4.8 Conclusions

4.8.1 The junction modelling demonstrates that the Ford Road/ Viridor site access operates with plenty of spare capacity in 2024 with the additional development traffic. There will be no congestion or delay as a result of the revised access arrangements for the CTP at Ford Airfield in either the 2017 or 2024.

4.8.2 The A259 Crookthorne Roundabout suffers from high volumes of east-west traffic and is already at capacity in 2017 on arm D in the AM peak period and arm B in the PM peak period. This situation deteriorates by 2024 when background traffic growth is added, with arm D over capacity in the AM peak period and arms A and B over capacity in the PM peak period. Proportionally, the development traffic, even under the worst-case scenario, is adding very few additional movements to the junction and the impacts in terms of additional queues are likely to be imperceptible, and less than the natural daily variations in general traffic flows.

- 4.8.3 The proposed extension to the operating hours helps to reduce the number of trucks movements per hour, which helps to mitigate the impacts of the proposed scheme.
- 4.8.4 A cumulative assessment, which includes the additional trucks forecast to be generated by the neighbouring Viridor site and the Hobbs Barn site in Climping, shows the additional impacts to be very small.

5 SUMMARY & CONCLUSIONS

5.1 Summary

- 5.1.1 Grundon Waste Management Ltd has commissioned Callidus Transport and Engineering Ltd to provide transport and highways advice for the forthcoming planning applications to revise the proposed access arrangements for the Circular Technology Park (CTP), Ford Airfield, Arundel.
- 5.1.2 This report represents the Transport Statement (TS) to support the planning application for a SLR that links the CTP with the access road to the waste water treatment works and Viridor site to the south. An increase in the number of HGV movements is sought as part of these proposals. It is proposed that up to 120 HGVs can enter and 120 HGVs can exit the site Mondays to Fridays, and 60 HGVs can enter and 60 HGVs can exit the site on Saturdays. A variation to the permitted delivery hours at the CTP Ford Airfield is also sought as part of these proposals in order to allow greater flexibility in the vehicle movements to the site. It is proposed that delivery hours are extended to cover 0600-2000 Monday to Friday, 0800-1800 on Saturdays, with no deliveries on Sunday/ Bank Holidays.
- 5.1.3 Much of the policy context and baseline evidence for the CTP scheme has been presented previously with the Transport Assessment for the consented planning scheme. Therefore, the TS focuses on the implications on the new access arrangements.
- 5.1.4 All access and egress for the CTP will be from the existing Viridor priority junction with Ford Road. The alternative site access arrangements have the benefits of a single point of access, greater efficiency of operations, improvements to local amenity, use of higher order roads, a high quality access point and conformity with the Adopted West Sussex Waste Local Plan.
- 5.1.5 The SLR will be a private road, designed to an appropriate standard with a 7.3m road width and a 2.0m footway. It has a near straight alignment over its approximately 180m length and there are no active frontages along its route. Swept path analysis demonstrates that the link road can satisfactorily accommodate all anticipated

vehicle movements. The Viridor priority junction with Ford Road will form the main point of access from the CTP site to the strategic road network. This junction is designed to a high standard with appropriate sightline visibility splays.

- 5.1.6 An assessment of the opportunities to use sustainable modes of transport has been reported on in the TS. Ford Road benefits from a footway along its entire length and is considered an appropriate route for competent cyclists. The nearest bus stops on Ford Road are at Nelson Row, just south of the Viridor site access on Ford Road. Ford Railway Station is located approximately 1km to the north.
- 5.1.7 A review of road accidents was undertaken as part of the TA work for the consented development. It reported on injury accidents on the local road network. These have been reviewed in this report by focusing on Ford Road and the A259. 8 accidents have been identified in the surrounding road network resulting in 9 casualties. The severity of all the accidents was recorded as 'slight' and there were no specific locations where accidents seemed to be occurring according to any discernible pattern.
- 5.1.8 A programme of traffic surveys on the surrounding road network was undertaken in March 2013. The data was further augmented by additional surveys at the Viridor priority junction in December 2015. An additional traffic survey was undertaken for Ford Road in February 2018. The combined data has been used to describe the baseline traffic movements and has been used in the modelling of the impacts of the development traffic on the surrounding road network in the future.
- 5.1.9 The TS has considered traffic generation under the consented planning scheme for the CTP and for a worst case scenario with a greater number of medium and heavy goods vehicle movements throughout the day. It is important to note that these proposals will not change the permitted annual waste throughput for the CTP, but will allow greater flexibility in the types of vehicles used to transport waste to the site. However, the new site access arrangement will mean that all development traffic will be focused on Ford Road and the A259.
- 5.1.10 The traffic appraisal for these proposals has included a high level assessment of

impacts to key links on the local road network and detailed junction modelling for the Ford Road/ Viridor site access and A259 Crookthorne Roundabout. The results have shown that there are no significant impacts identified for key links in the local road network.

5.1.11 The Ford Road/ Viridor site access is demonstrated to operate with plenty of spare capacity in 2017, the year of opening, and the future year of 2024 under all scenarios tested.

5.1.12 The junction assessment for the A259 Crookthorne Roundabout shows that it has existing capacity problems on the east-west movements. This situation deteriorates further by 2024 when background traffic growth is added, with the Ford Road arm also experiencing capacity issues in the PM peak period regardless of the development. The development traffic adds very little traffic to these movements and the junction modelling results have shown that the impact on the capacity and delay is judged as being imperceptible.

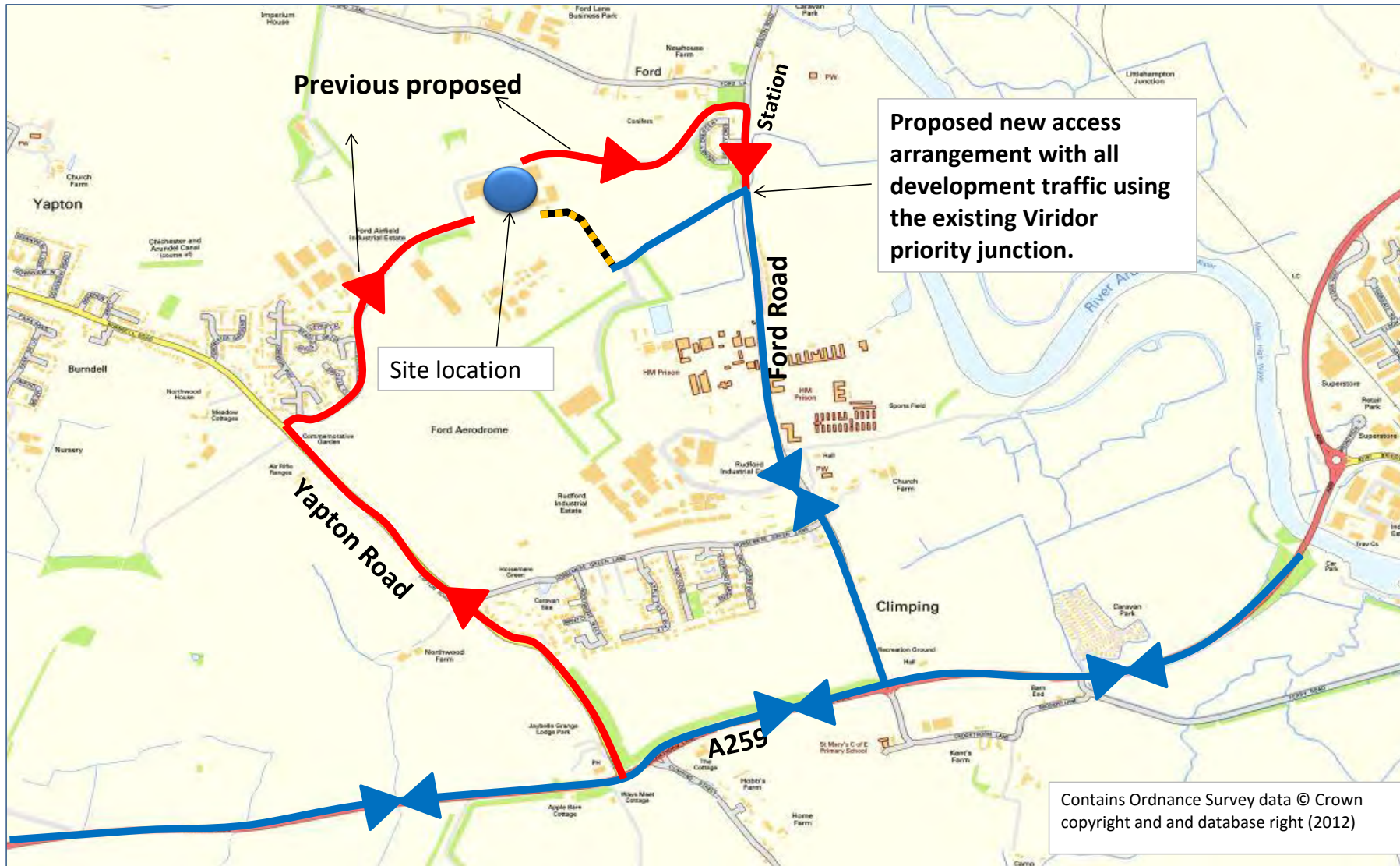
5.1.13 The results of the link and junction assessments demonstrate that under the new site access arrangements there is virtually no difference in terms of traffic impact between the consented CTP planning scheme and the revised proposals for vehicle movements and permitted delivery hours.

5.2 Conclusion

5.2.1 For the reasons given in this TS, the proposed SLR represents a beneficial alternative site access arrangement for the new Circular Technology Park that will have no perceptible adverse impacts on the local highway network. Therefore, there should be no reasons on transport and highways grounds why this proposal should not be acceptable to the determining Authority.





APPENDIX A

FIGURES



Proposed new access arrangement with all development traffic using the existing Viridor priority junction.

KEY:

- Previous route arrangement: 
- Proposed route arrangement: 
- Direction: 
- Proposed southern link road: 

Location:
Google
<http://goo.gl/maps/fCISO>

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Title: Alternative Access Arrangements for CTP, Ford Airfield

Project Title:	Southern Link Road - CTP, Ford Airfield		
Job Number:	TE1093		
Client:	Grundon Waste Management Ltd		
Status:	Planning	Figure No:	Figure 1
Scale:	NTS		

APPENDIX B

CORRESPONDENCE

David Cox

From: David Cox <david.cox@callidusgroup.co.uk>
Sent: 22 March 2016 14:53
To: 'dominic.smith@westsussex.gov.uk'
Cc: 'robert.spriggs@callidusgroup.co.uk'
Subject: Re: Transport Scope - CTP Ford Airfield, Alternative Site Access
Attachments: Figure 1 Alternative Access Arrangement.pdf

Good afternoon Dominic,

Further to recent communications with Robert Spriggs at Callidus, we write to request your views on the required transport scope of work for a forthcoming planning application to revise proposals for access to the Circular Technology Park (CTP) at Ford Airfield.

The previous consented arrangement was to access the Application Site from the established access points on Rollaston Park and on Ford Road. This arrangement proposed a one-way circulatory route for all vehicles using the site. Vehicles would arrive at the site via Yapton Road and Rollaston Park, and depart from the site via Ford Road using the existing service road.

Grundon now intend to submit a further application for a southern link road, which links the Circular Technology Park with the access road to the Viridor site to the south. All access and egress to the CTP would therefore be from the existing Viridor priority junction with Ford Road. The trip distribution assumptions for the CTP-related traffic would therefore need to be revised so that all inbound traffic is distributed to the existing Viridor access.

Figure 1 (see attachment) illustrates the revised proposal for access to the CTP at Ford Airfield. Grundon are currently in the process of trying to negotiate a land deal for this new site access.

The effect of these latest plans will be to load all the development traffic onto the A259 junction with Ford Road. Trip generation assumptions would remain unchanged from the consented planning scheme for the CTP, Ford Airfield.

Callidus therefore proposes that a Transport Statement is submitted in support of the planning application for the southern link road to the CTP site. This will assess the impact of the revised access proposals for the existing Viridor priority junction, Ford Road and its junction with the A259 in terms of traffic capacity in the year of opening and 2024 (to conform to the previous TA analysis). The following headings indicate the proposed structure of the Transport Report:

- Introduction
- Proposed development
- Baseline conditions (where changed)
- Traffic appraisal
- Mitigation (as necessary)
- Conclusions
- Appendices – various figures and tables.

We look forward to your views on the required transport scope of work for these revised access proposals for the CTP, Ford Airfield.

Kind regards,

David

DAVID COX

SENIOR TRANSPORT PLANNER



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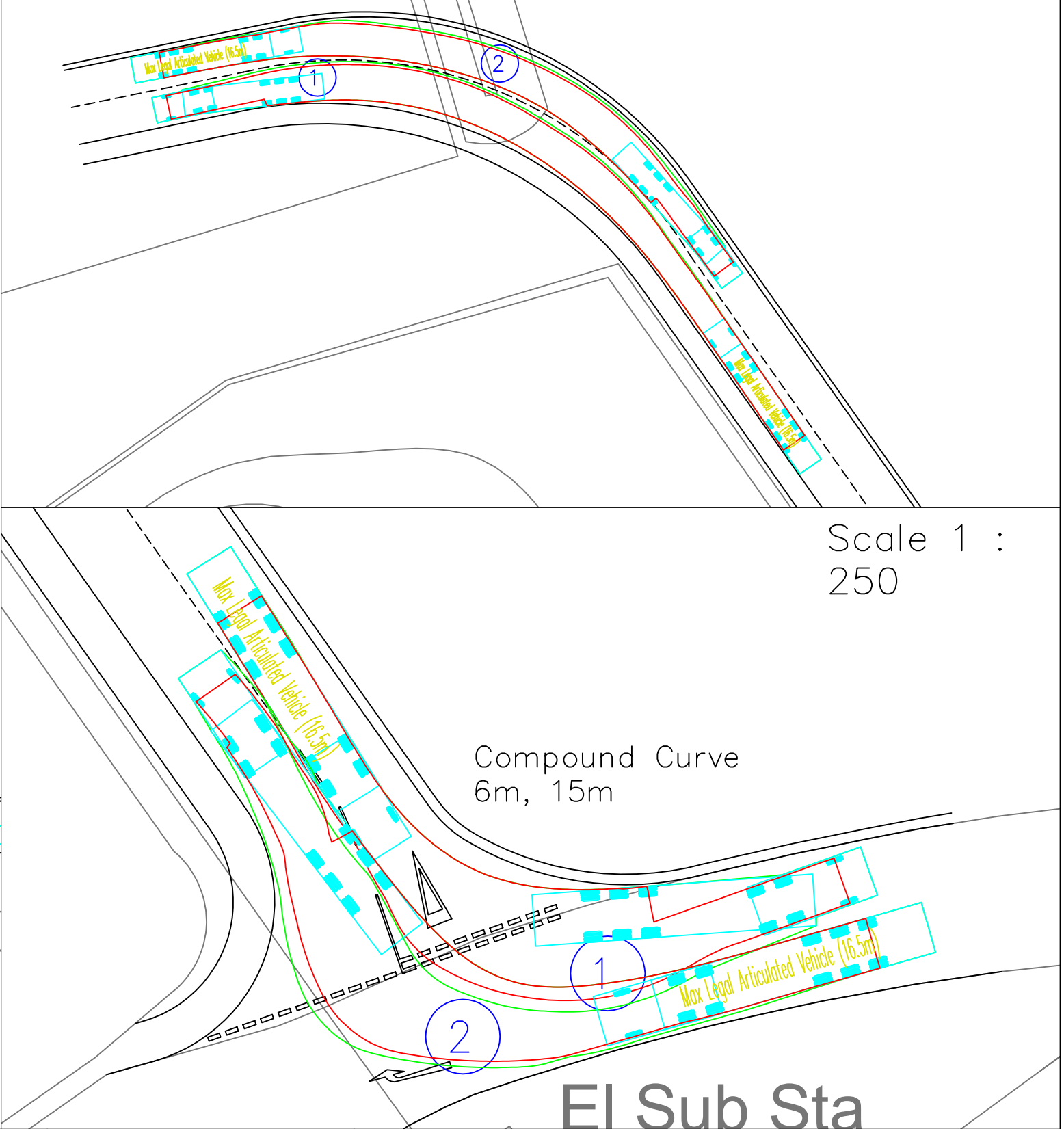
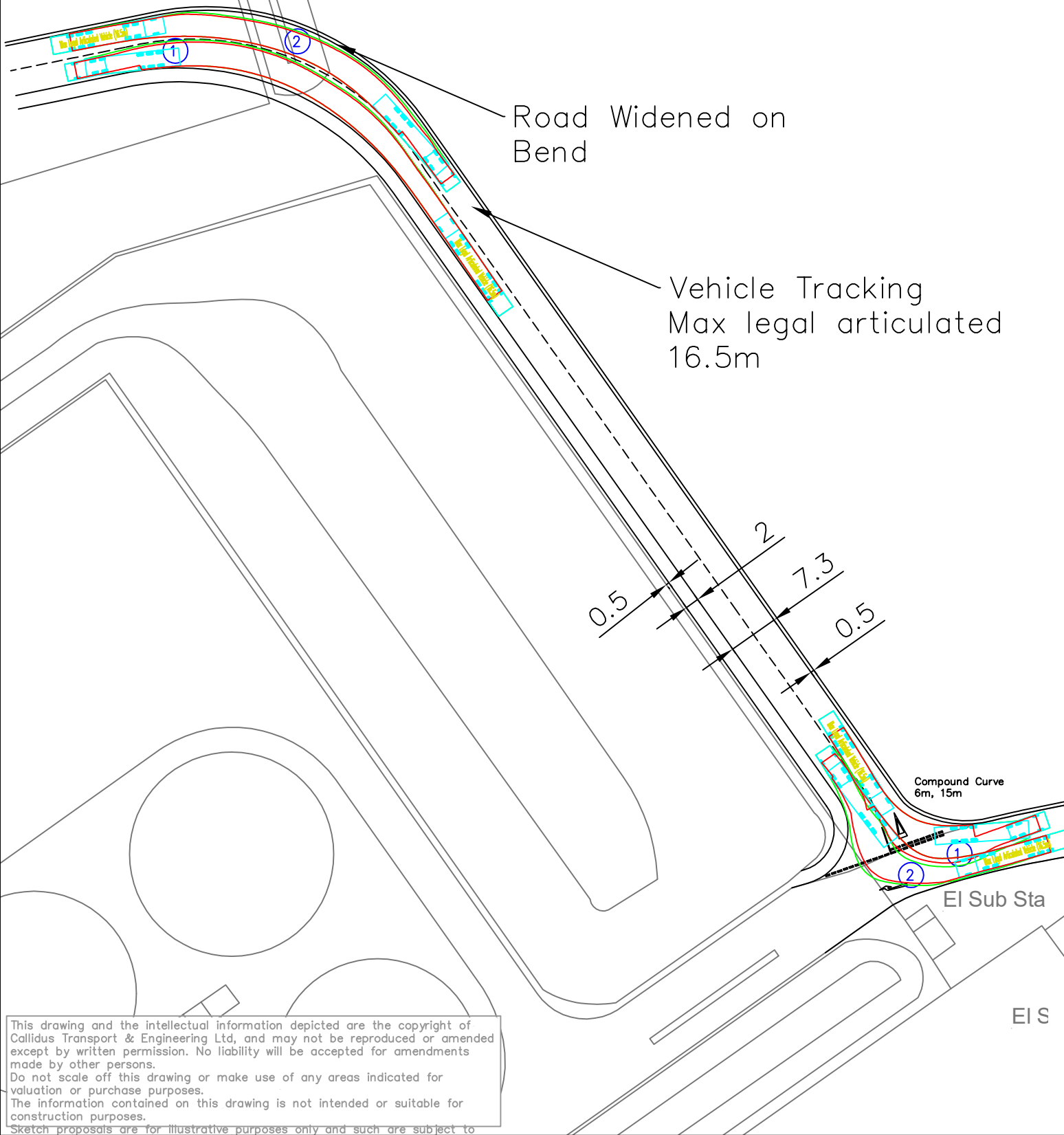
APPENDIX C

DRAWINGS

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Scale 1 : 750

Scale 1 : 500



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REVISIONS				

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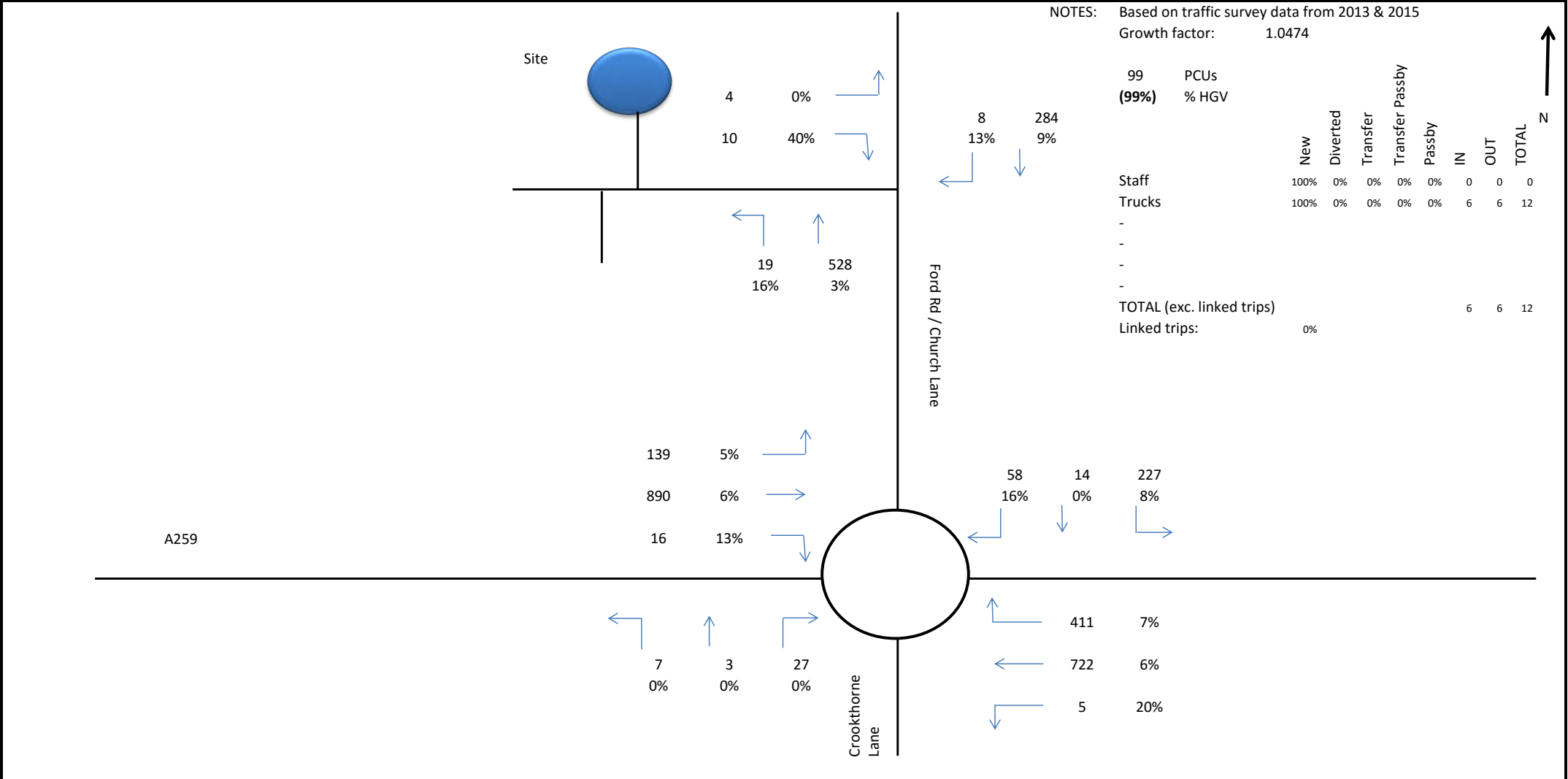




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PAPER SIZE:	A3	Client:	Grundon Waste Management
		Dwg. No.:	TE/1093/312

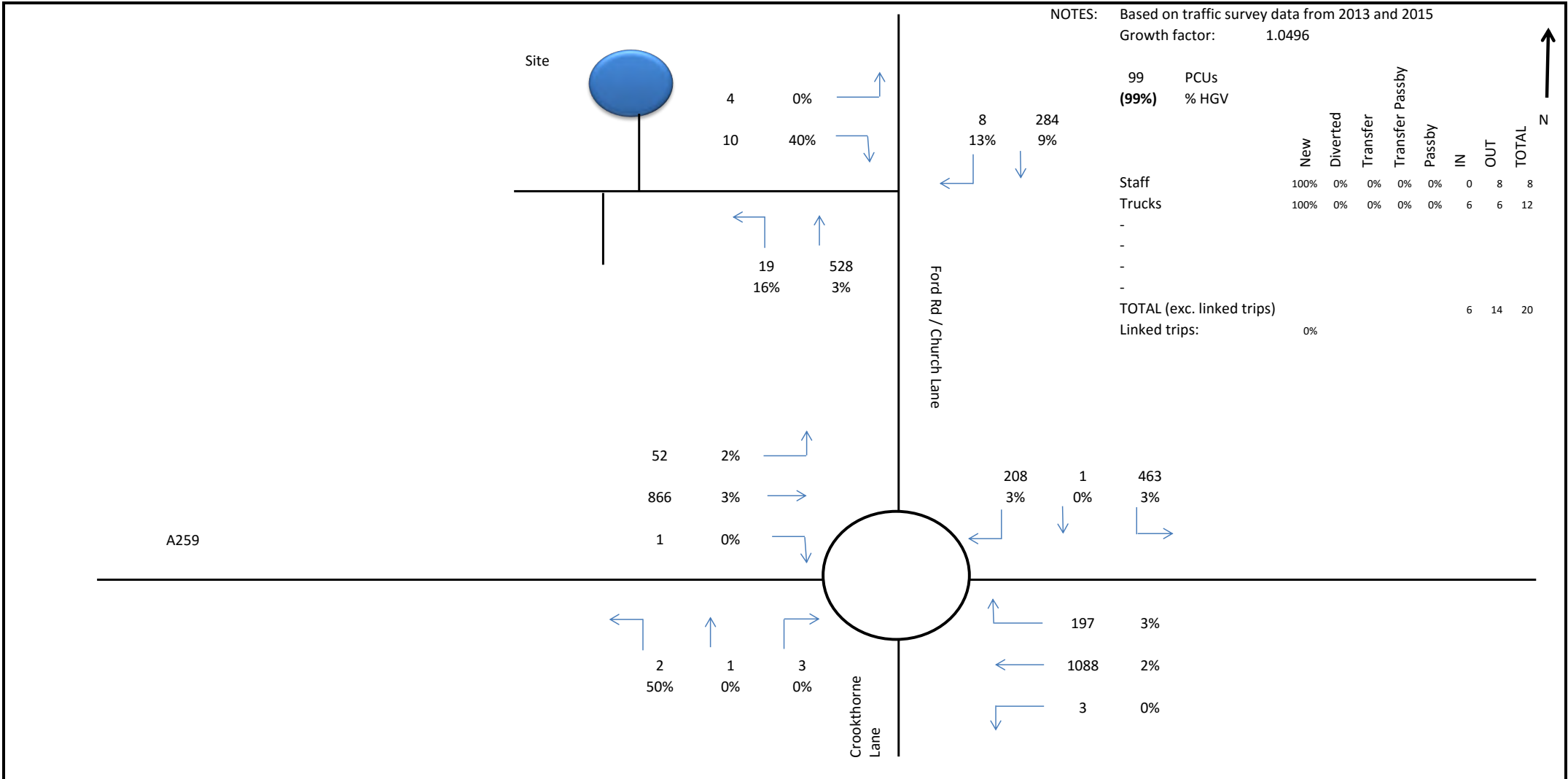
APPENDIX D

TRAFFIC FLOWS



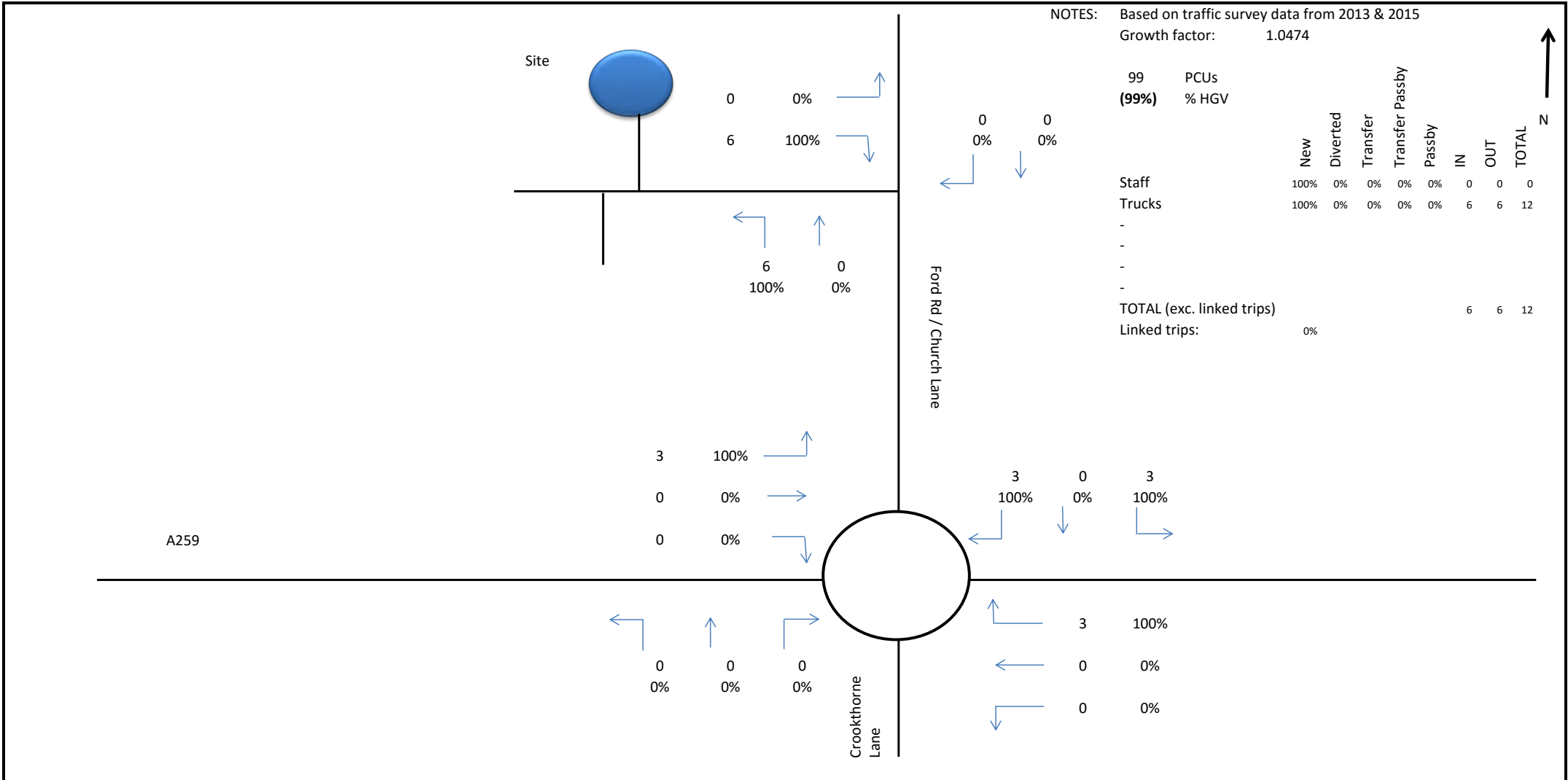
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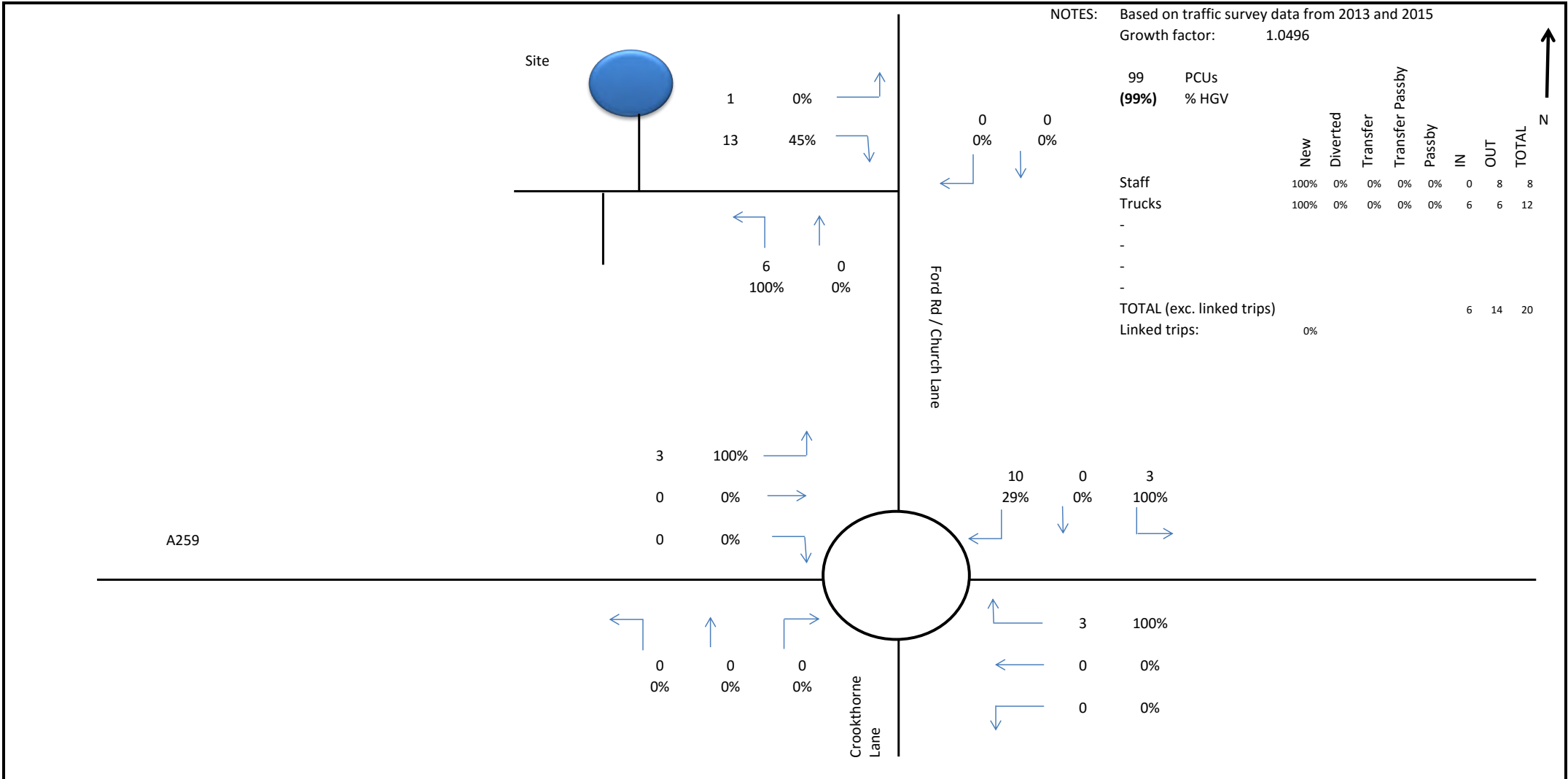
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Job Number:	TE1093		
Client:	Grundon Waste Management		
Status:	Planning	Figure No:	Figure 1
Scale:	NTS		

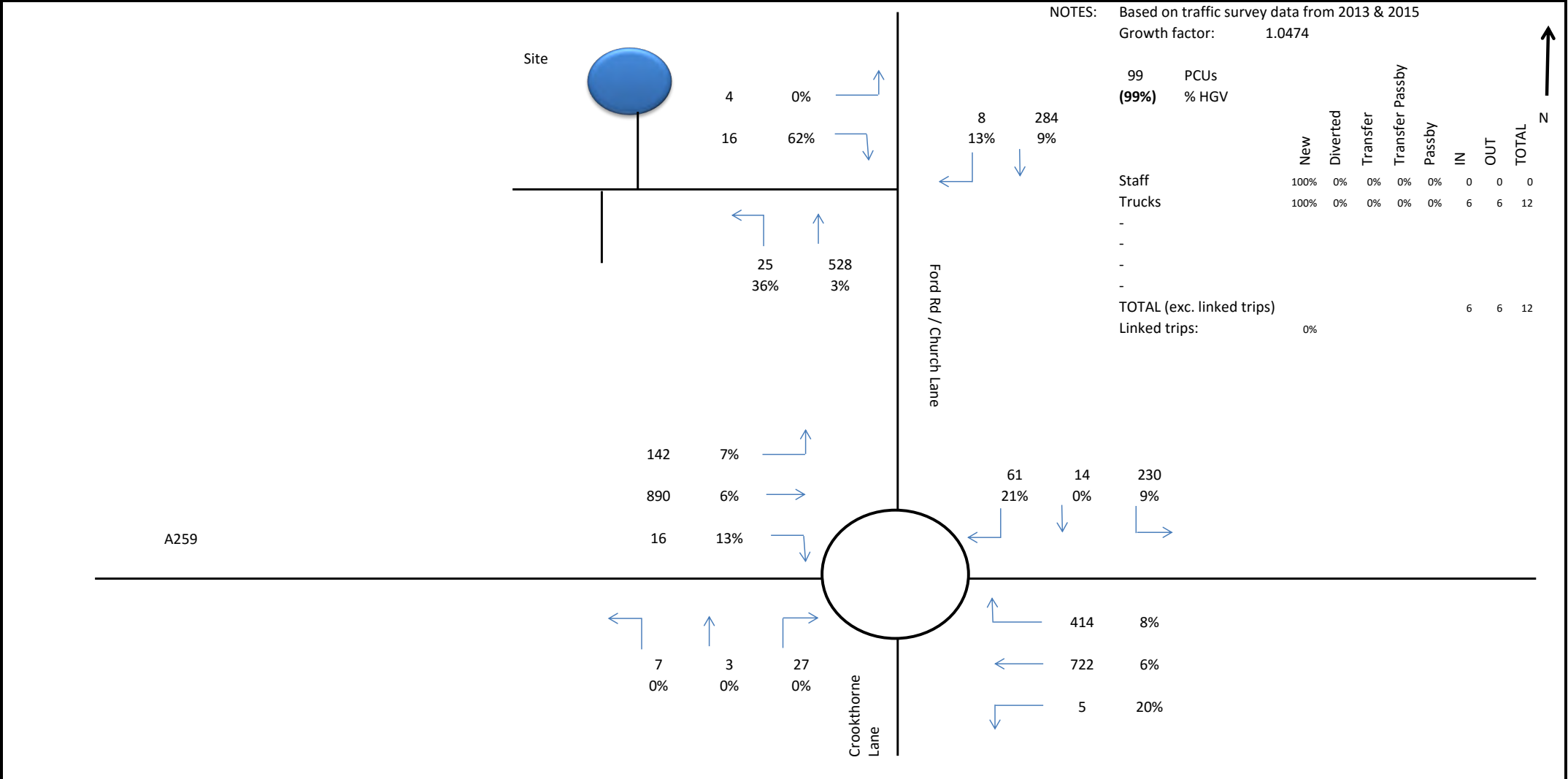


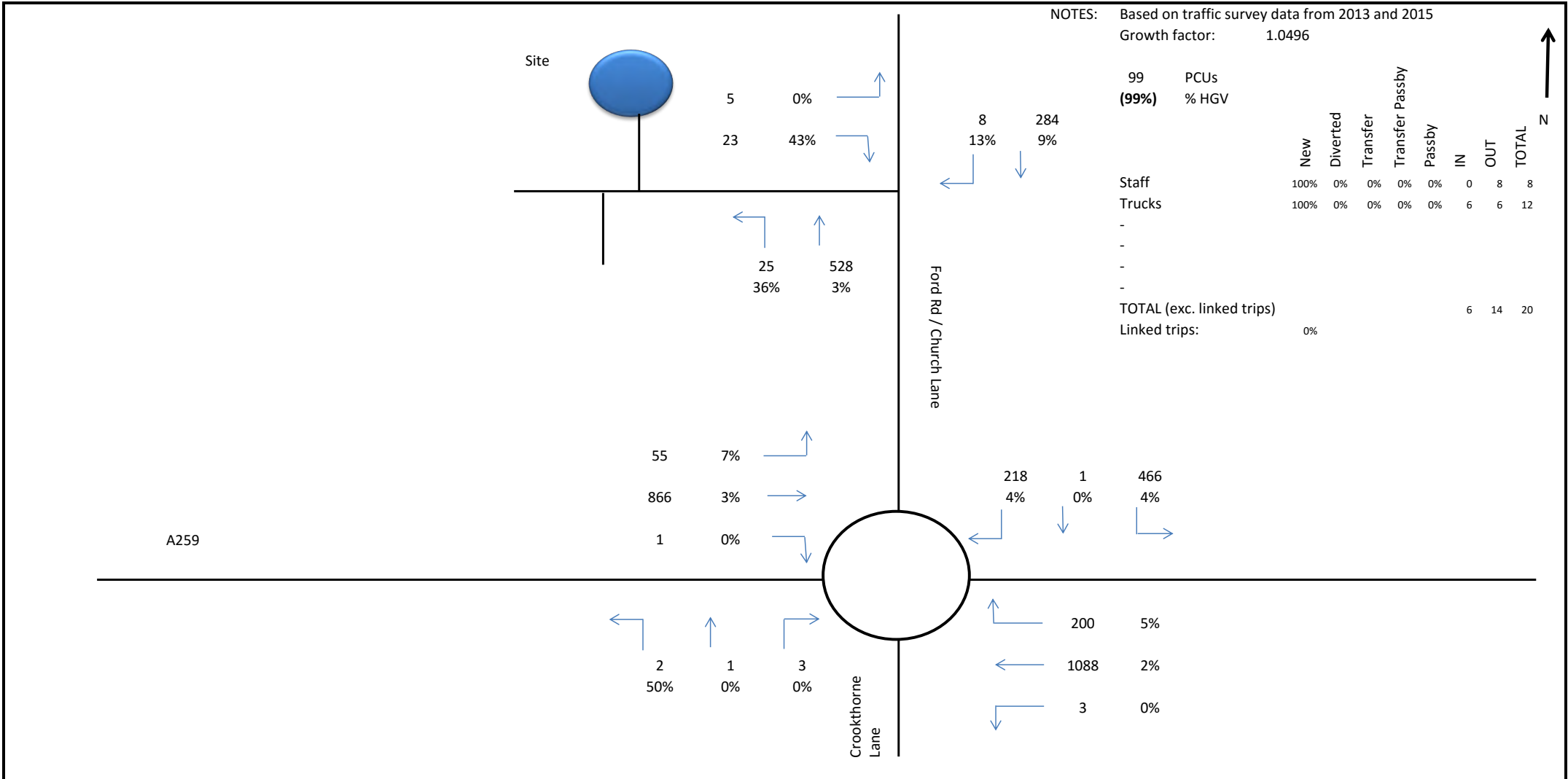
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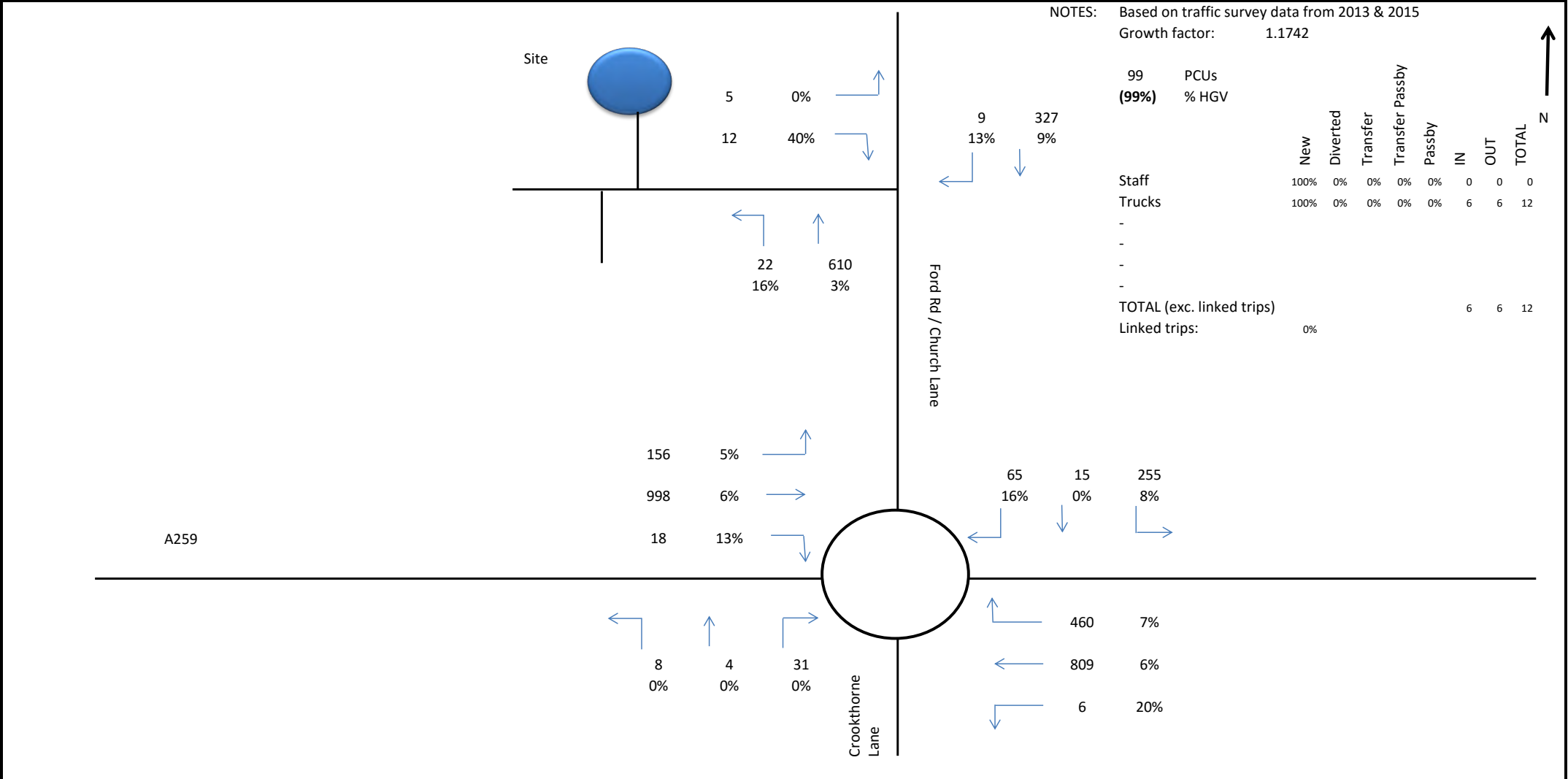
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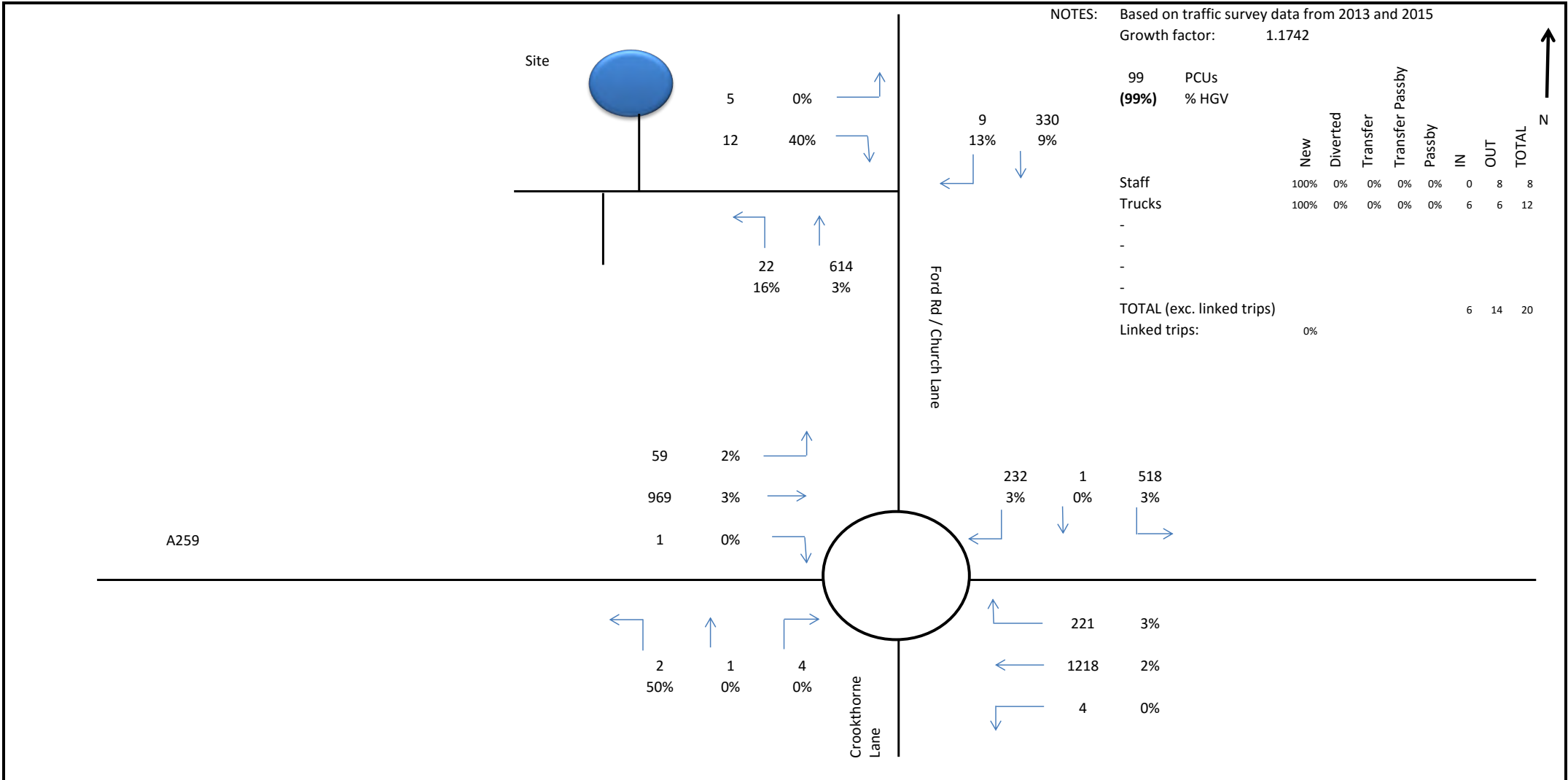


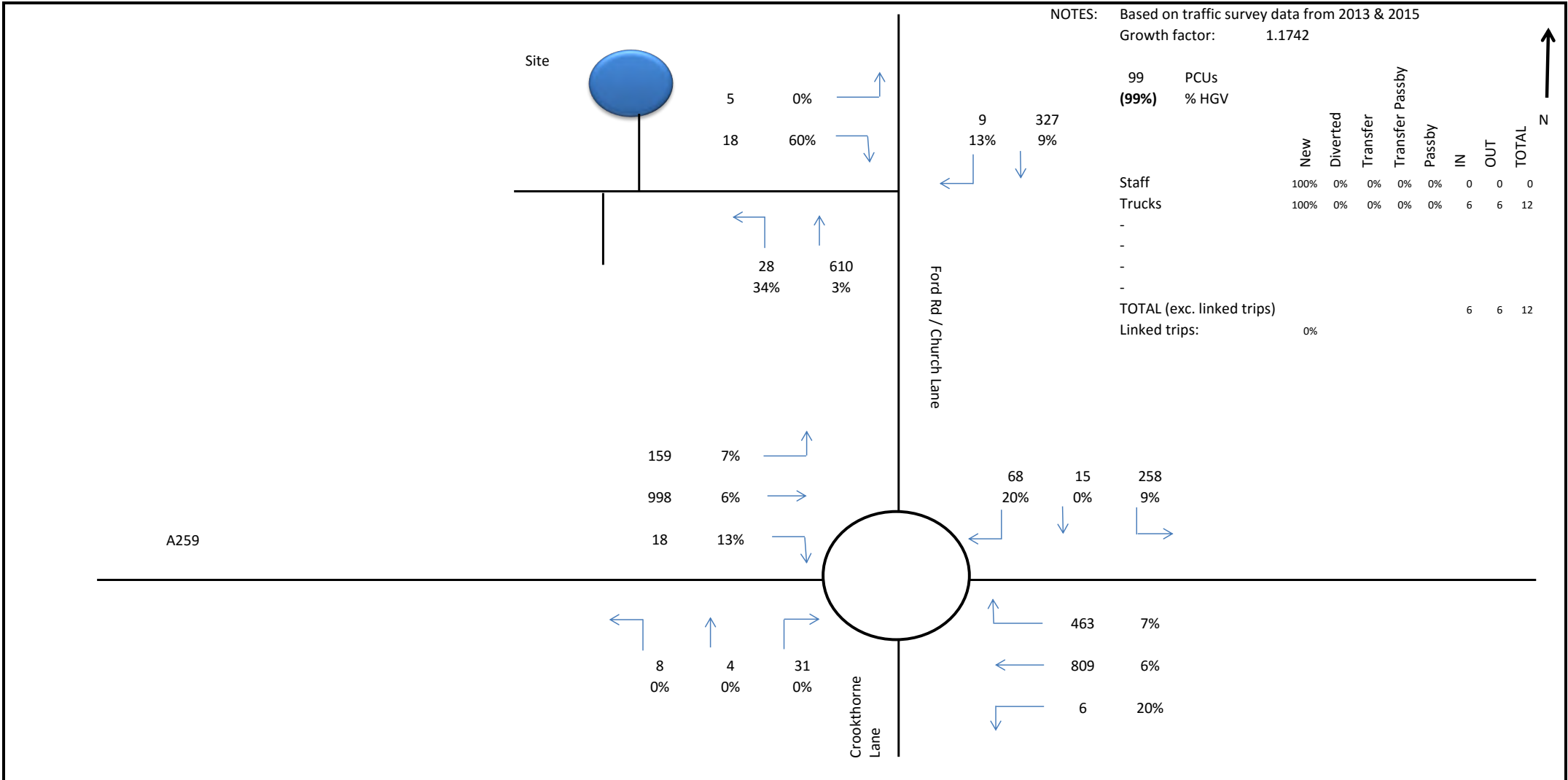




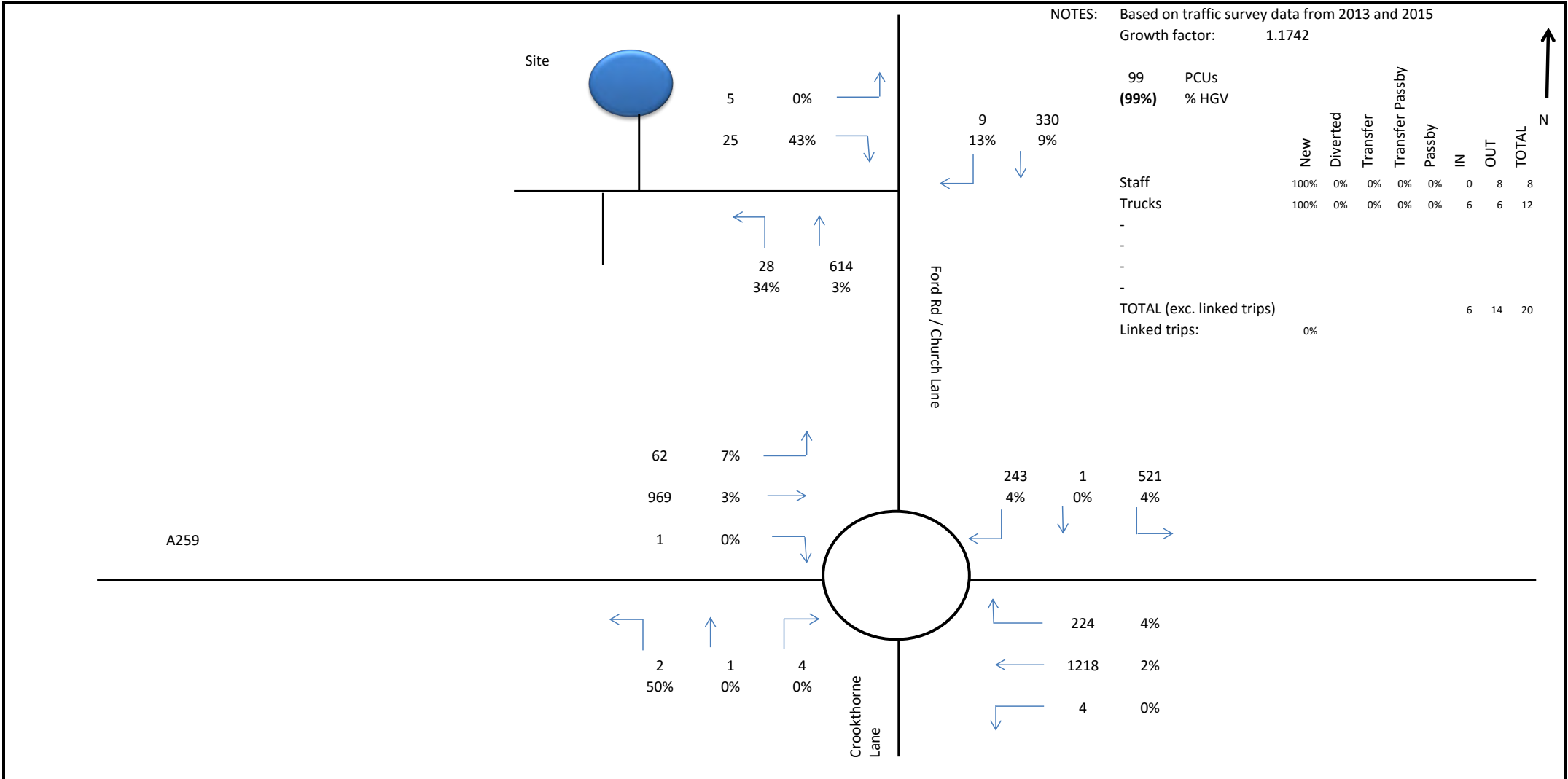
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Status:	Planning	Figure No:	Figure 7
Scale:	NTS		



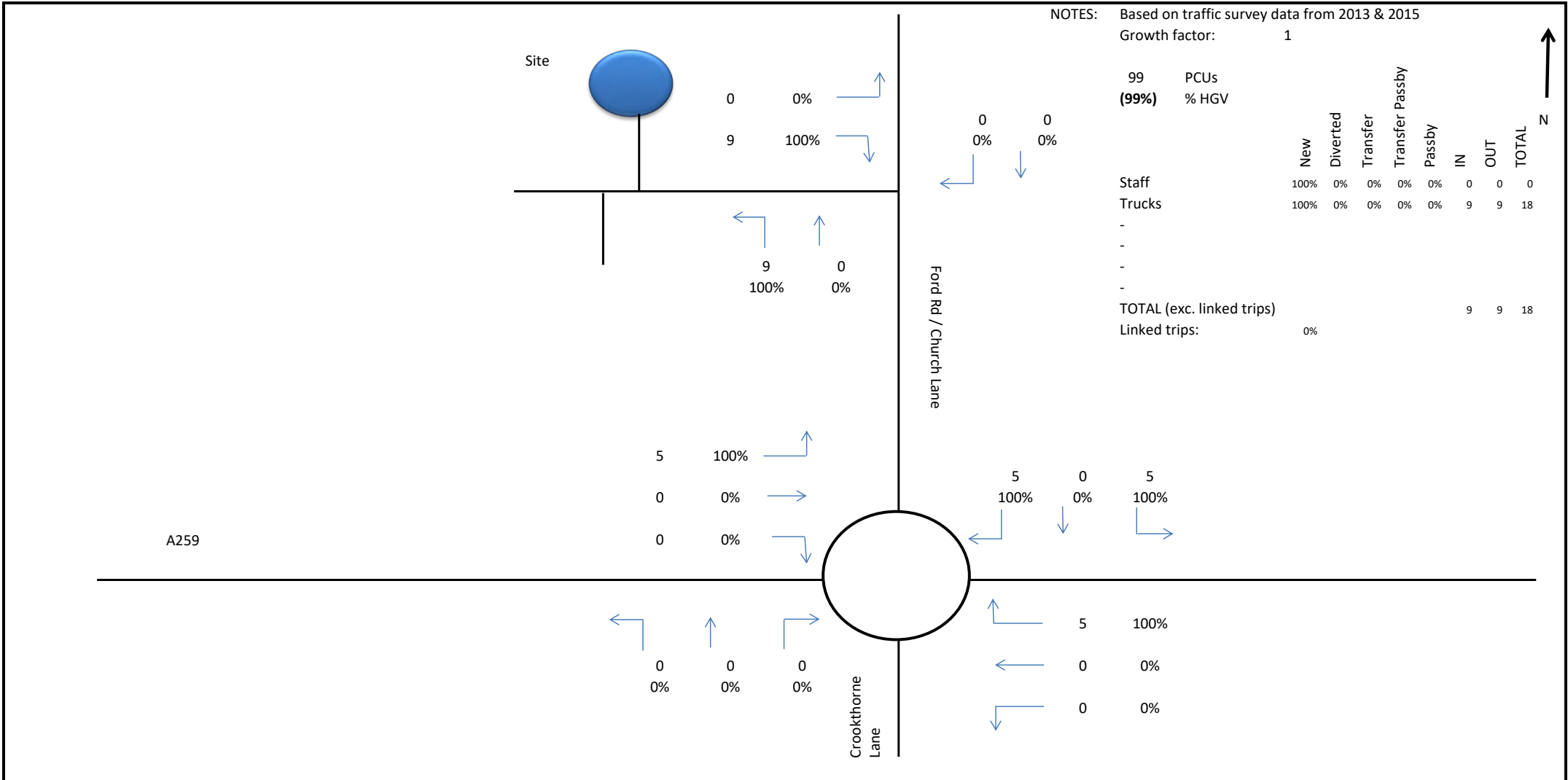


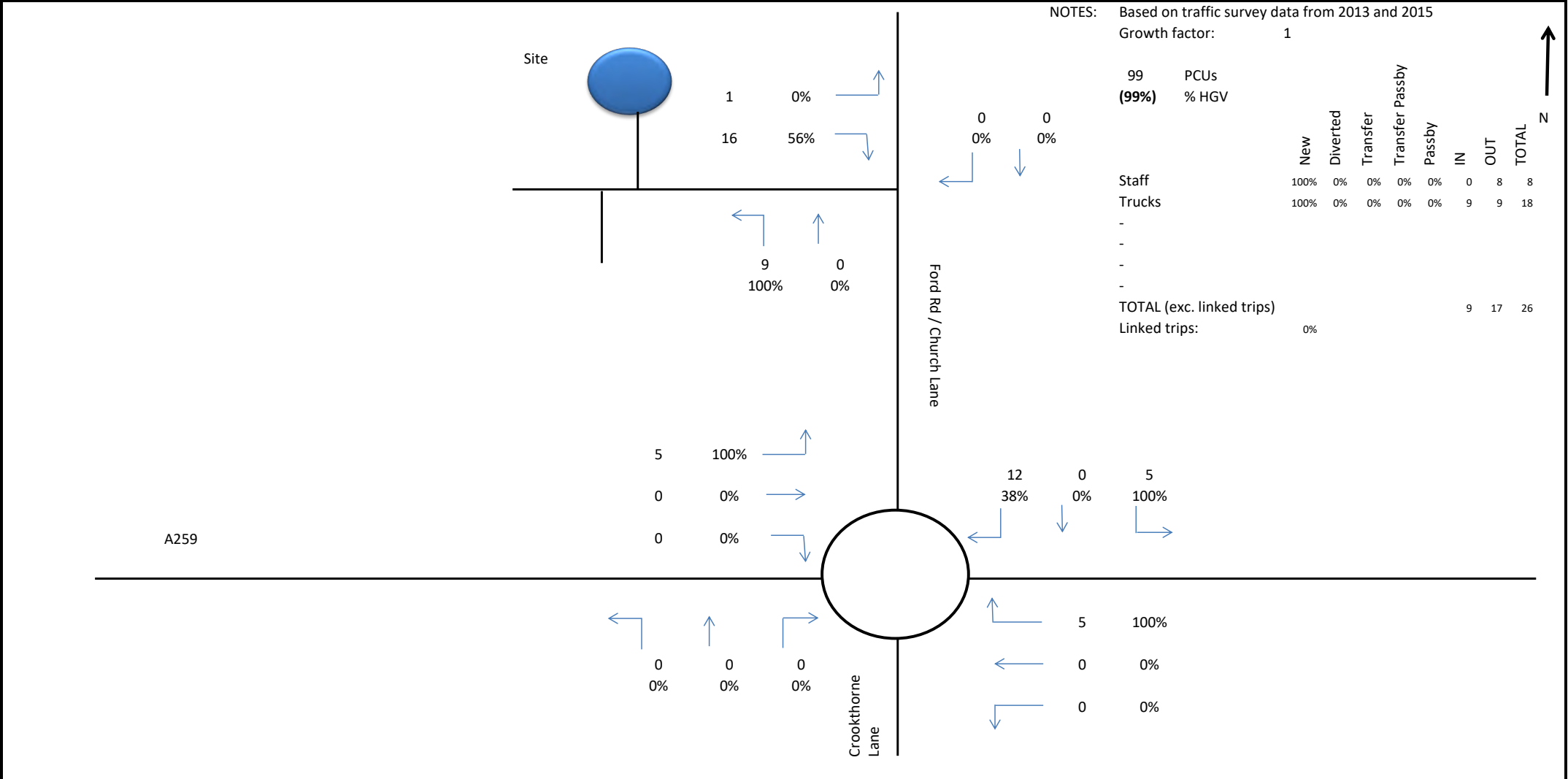
Project Title:	Circular Technology Park, Ford Airfield		
Job Number:	TE1093		
Client:	Grundon Waste Management		
Status:	Planning	Figure No:	Figure 9
Scale:	NTS		



Title: Traffic Flows (PM 1700-1800 Base 2024 + Development - Consented Planning Scheme)

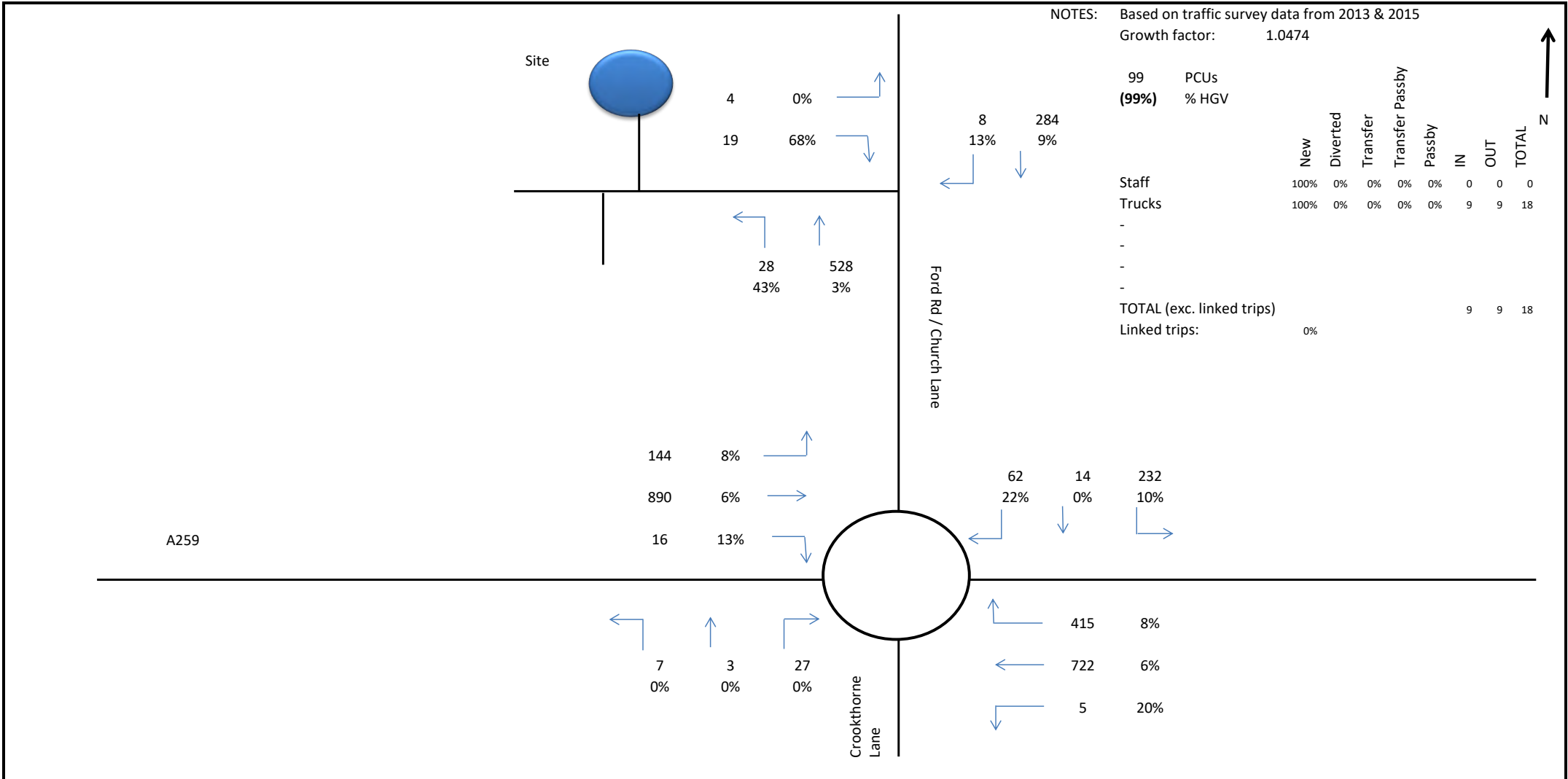
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Job Number:	TE1093		
Client:	Grundon Waste Management		
Status:	Planning	Figure No:	Figure 10
Scale:	NTS		

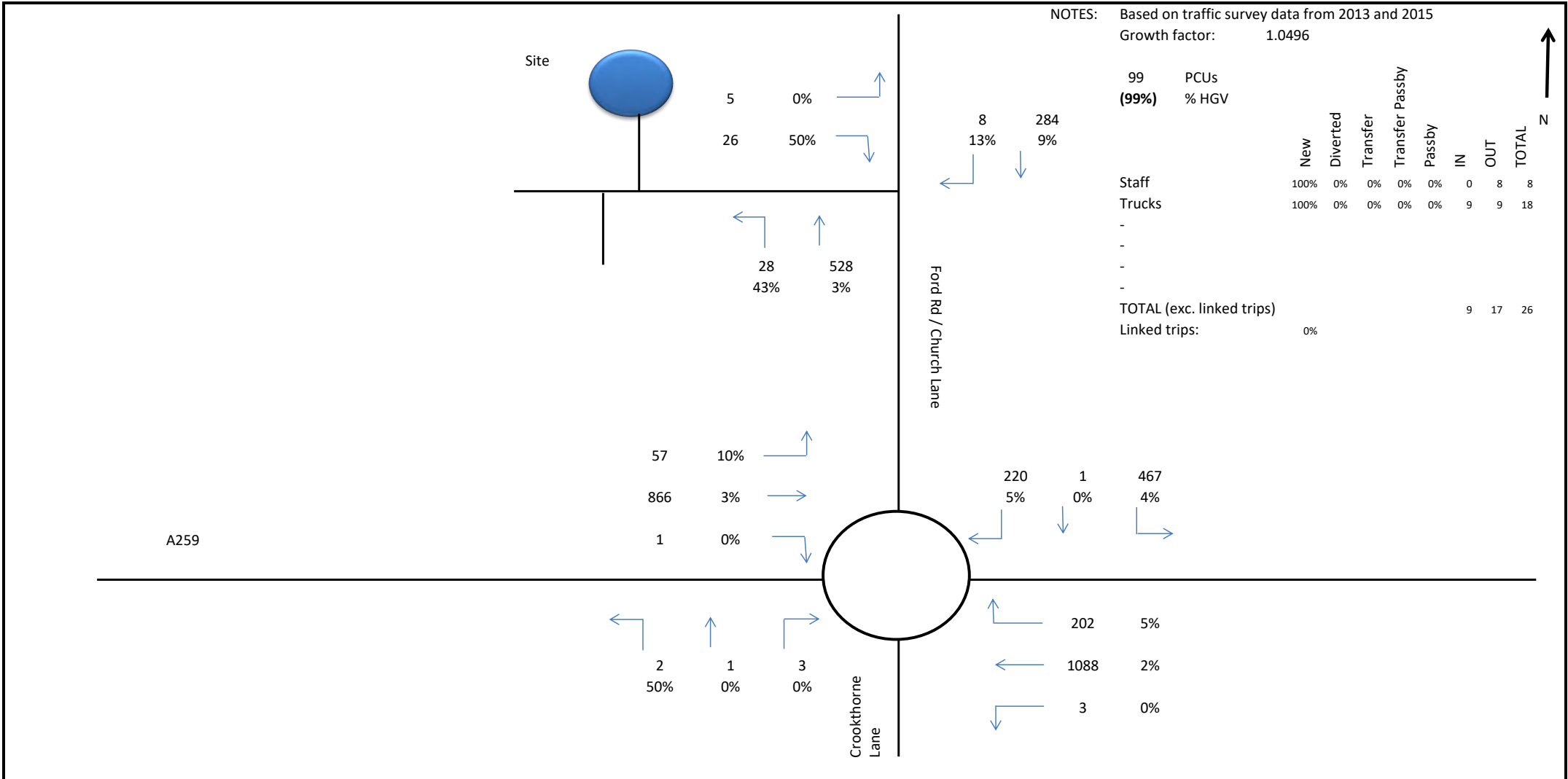


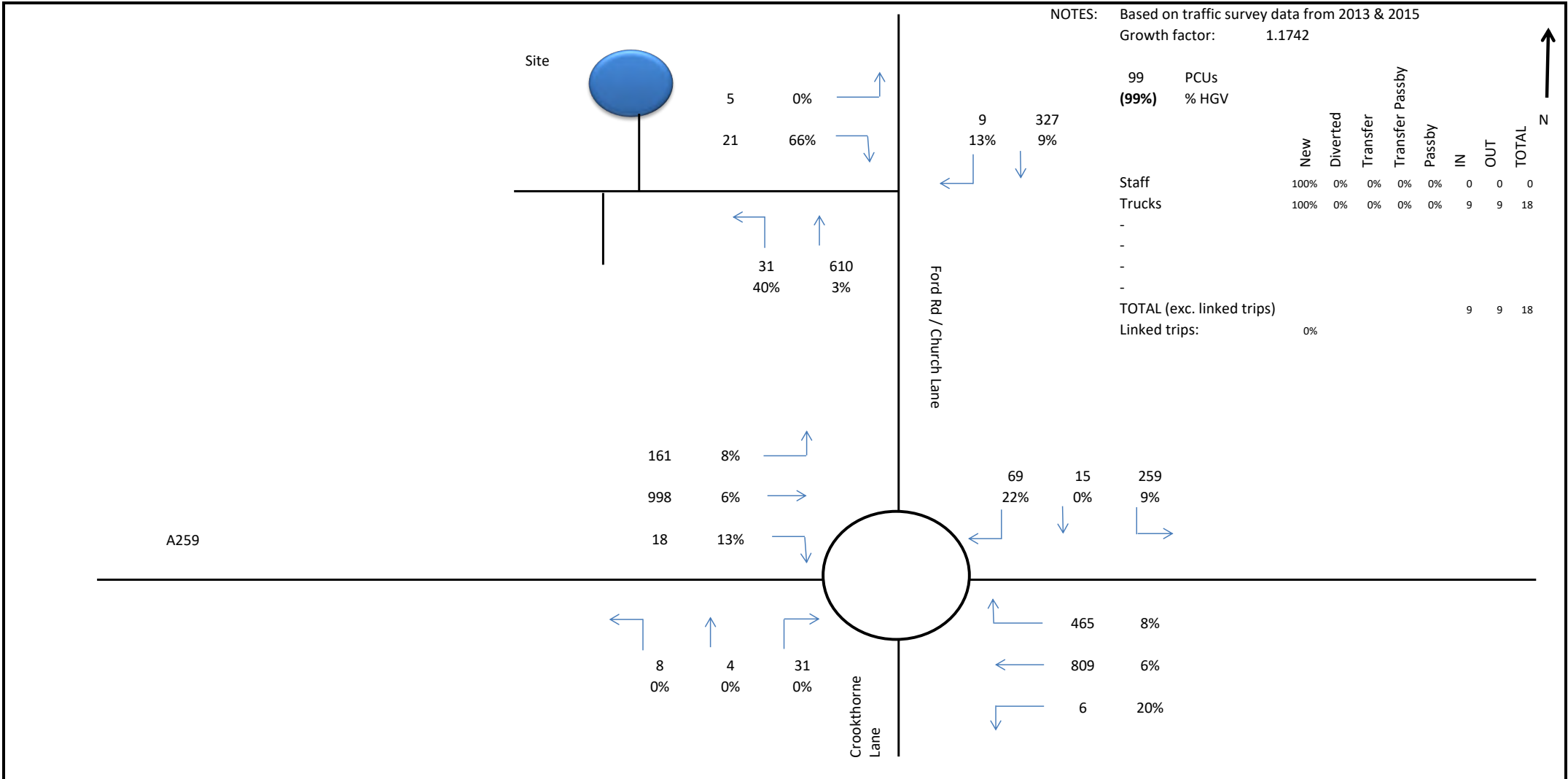


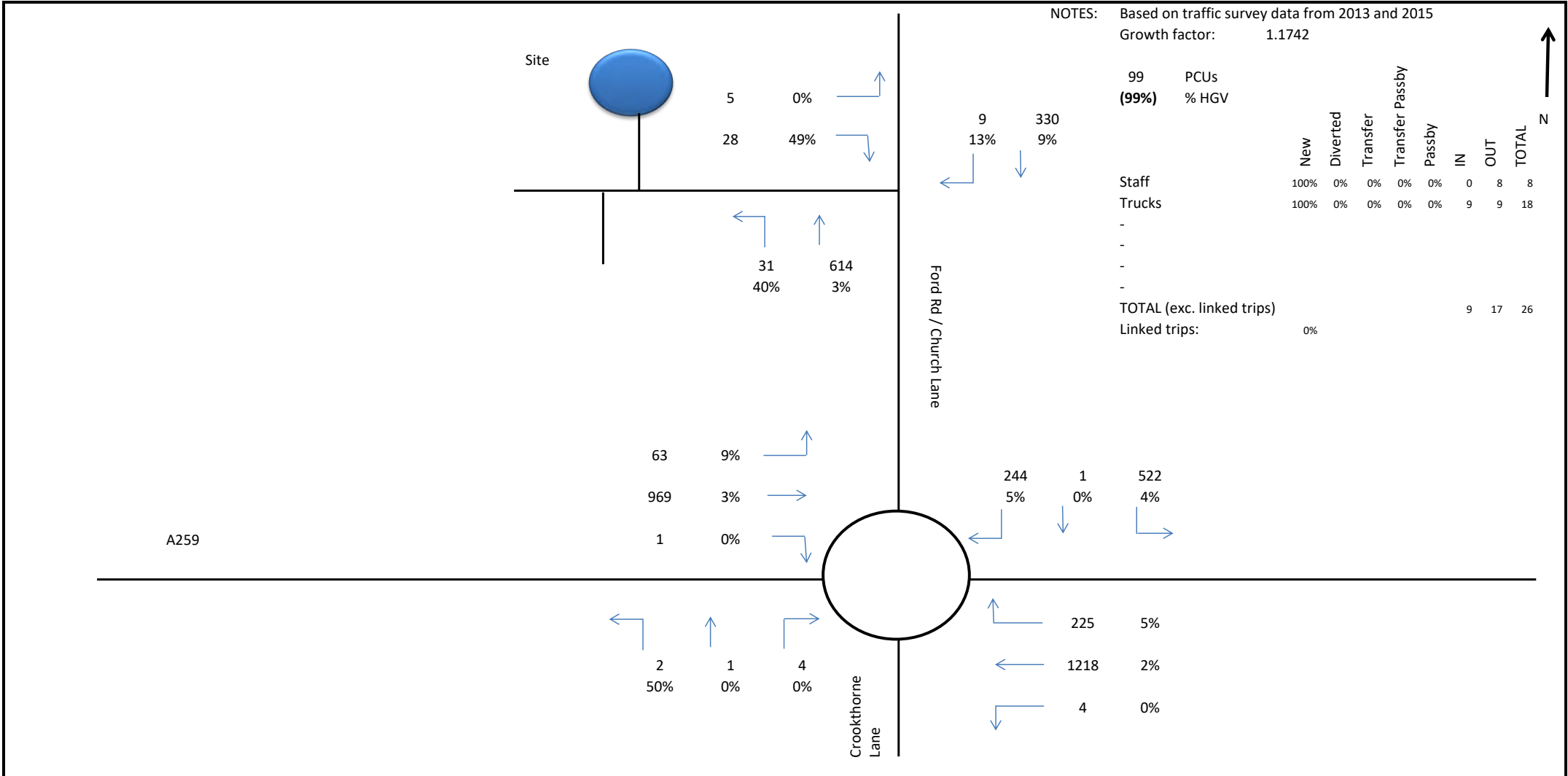
Title: Traffic Flows (PM 1700-1800 Development Only - Worst Case Scenario)

Project Title:	Circular Technology Park, Ford Airfield		
Job Number:	TE1093		
Client:	Grundon Waste Management		
Status:	Planning	Figure No:	Figure 12
Scale:	NTS		

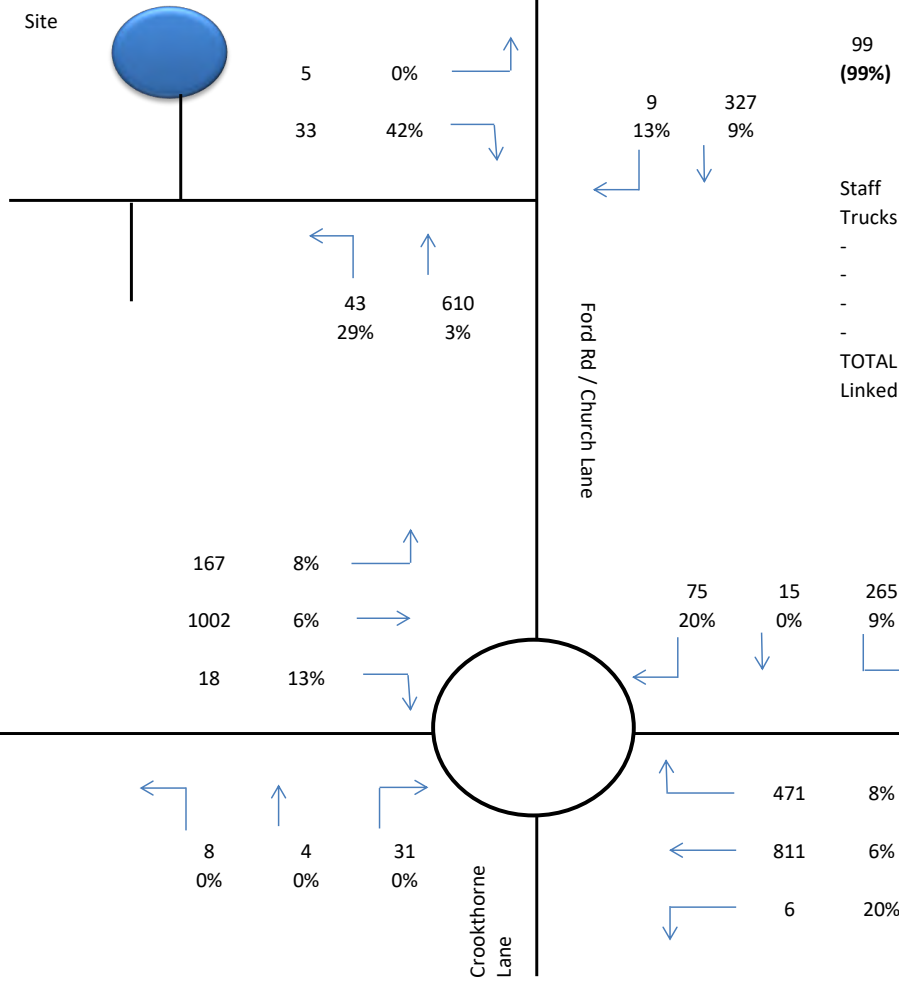








Cumulative Assessment for Crookthorne Roundabout
 Included in the baseline flows is the AM peak flows for:
 - Viridor MRF at Full Capacity
 - Hobbs Barn WTS/ MRF



NOTES: Based on traffic survey data from 2013 & 2015
 Growth factor: 1.1742

99 PCUs
 (99%) % HGV

Staff
 Trucks

TOTAL (exc. linked trips)
 Linked trips:

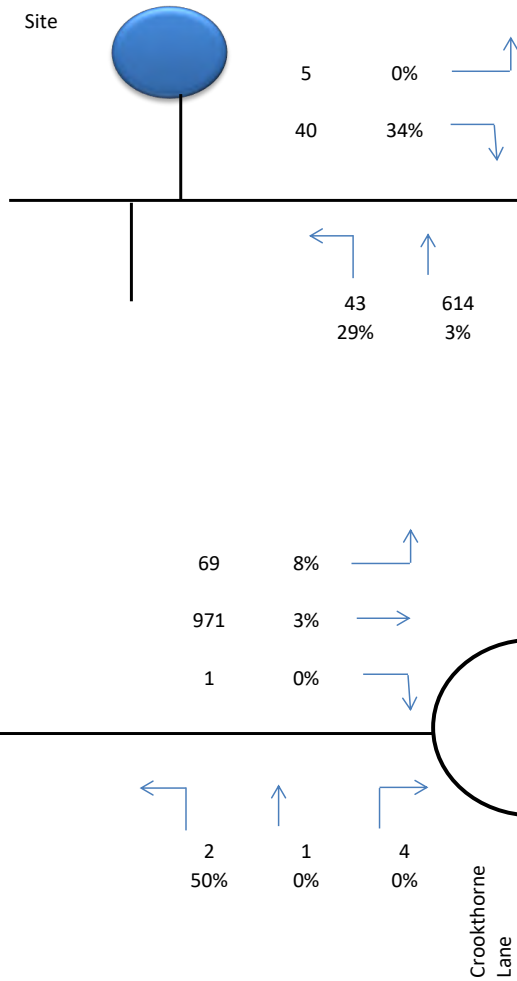
	New	Diverted	Transfer	Transfer Passby	Passby	IN	OUT	TOTAL
Staff	100%	0%	0%	0%	0%	0	0	0
Trucks	100%	0%	0%	0%	0%	9	9	18
TOTAL (exc. linked trips)						9	9	18
Linked trips:	0%							



Title: Traffic Flows (AM 0800-0900 Base 2024 + Development + Cumulative)

Project Title:	Circular Technology Park, Ford Airfield		
Job Number:	TE1093		
Client:	Grundon Waste Management		
Status:	Planning	Figure No:	Figure 17
Scale:	NTS		

Cumulative Assessment for Crookthorne Roundabout
 Included in the baseline flows is the PM peak flows for:
 - Viridor MRF at Full Capacity
 - Hobbs Barn WTS/ MRF



NOTES: Based on traffic survey data from 2013 and 2015
 Growth factor: 1.1742

99 PCUs
 (99%) % HGV

Staff
 Trucks

TOTAL (exc. linked trips)
 Linked trips:

	New	Diverted	Transfer	Transfer Passby	Passby	IN	OUT	TOTAL
Staff	100%	0%	0%	0%	0%	0	8	8
Trucks	100%	0%	0%	0%	0%	9	9	18
TOTAL (exc. linked trips)						9	17	26
Linked trips:	0%							



Title: Traffic Flows (PM 1700-1800 Base 2024 + Development + Cumulative)

Project Title:	Circular Technology Park, Ford Airfield		
Job Number:	TE1093		
Client:	Grundon Waste Management		
Status:	Planning	Figure No:	Figure 18
Scale:	NTS		

APPENDIX E

TRAFFIC MODELLING OUTPUTS (AVAILABLE IN ELECTRONIC FORMAT)

Contact info@callidusgroup.co.uk

Callidus

TRANSPORT

HIGHWAYS

DRAINAGE

FLOOD RISK

PLANNING SUPPORT SERVICES



Callidus Transport & Engineering Ltd

3 Chapel Row, Bath, BA1 1HN

T 01225 303 523 **E** info@callidusgroup.co.uk **W** www.callidusgroup.co.uk

Appendix 2

West Sussex County Council Scoping Opinion, March 2020

**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL
IMPACT ASSESSMENT) REGULATIONS 2017:
REGULATION 15 – Request for a Scoping Opinion**

Proposal

Energy Recovery Facility and Transfer Station

Site

**Ford Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel,
BN18 OHY**

Applicant

Ford EfW Ltd (Grundon Waste Management Ltd and Viridor)

Agent

Terence O'Rourke

Date received

24 January 2020

**Classification of the Proposed Development and requirement for an
Environmental Impact Assessment**

As indicated within the Scoping Request (paragraph 1.4), the proposed development would fall within Part 10 of Schedule 1 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') relating to 'Waste disposal installations for the incineration or chemical treatment of non-hazardous waste with a capacity exceeding 100 tonnes per day'. As a result, an Environmental Impact Assessment (EIA) is necessary for the proposed development.

The EIA Regulations allow for a developer to ask the local planning authority for their formal opinion (a 'Scoping Opinion') regarding the information to be supplied in the Environmental Statement (ES). This provides clarity as to what the local planning authority considers the main effects of the development are likely to be, and accordingly, the main topics on which the ES should focus.

West Sussex County Council (WSSCC) has provided this Scoping Opinion in response to the information provided by the developer on 24 January 2020. In providing this response, consultation has been undertaken with the relevant statutory authorities, along with the relevant Parish Councils.

SCOPING OPINION

1. Location

- 1.1 The site description is set out at section 2.0 of the Scoping Request. The site is some 450 metres west of Ford, some 1.8 kilometres east of Yapton, 2km west of Littlehampton, and 4km south of Arundel.
- 1.2 Known collectively as the Circular Technology Park (CTP), the site is some 7.12 hectares in area (including access road) and located adjacent to the former airfield, which around its periphery is used as agricultural land.
- 1.3 The site itself is largely flat hardstanding and contains three large buildings in the northern half, two of which were hangars, and one industrial building which currently contains waste transfer activities. The site has planning permission for further development of waste operations to include an energy from waste (EfW) facility that, when constructed, would be contained within a large new building in the southern section of the site (ref. WSCC/096/13/F). While the planning permission has been implemented, the EfW element of the proposals has not been constructed to date.
- 1.4 Access to the site is via a dedicated road to the south east of the site, following the boundary of the existing Ford Waste Water Treatment Works, and includes part of the established airfield service road from Ford Road.
- 1.5 To the south of the site is an area of sports pitches, a large Waste Water Treatment Works, Ford Airfield (used for a Sunday market and Car Boot events), Ford Open Prison, and the Viridor waste Materials Recovery Facility (MRF). The wider area includes a number of industrial and business parks including an indoor soft play and sports centre, and Ford Airfield Industrial Estate to the west, Ford Lane Business Park and Trade Estate to the north, and Rudford Industrial Estate approximately 550m to the south.
- 1.6 The closest residential properties to the site are those in Rodney Crescent to the north-east. The wider locality includes existing residential properties at Rollaston Park and Yapton to the west, and Climping to the south. A number of residential properties border the surrounding road network where HGVs are routed, most notably those along and Ford Road/Church Lane (including Nelson Row).
- 1.7 However, it is important to note that the Arun Local Plan includes Strategic Housing Allocations on land both immediately adjacent to the site and in the surrounding areas (SD7 Yapton, SD8 Ford and SD10 Climping). In addition, Arun District Council are currently considering a planning application, registered on 25 February 2020, seeking "Outline planning application (with all matters reserved except for access) for the development of up to 1,500 dwellings (Use Class C3), 60-bed care home (Use Class C2), up to 9,000 sqm of employment floorspace (Use Classes B1), local centre of up to 2,350 sqm including up to 900 sqm retail / commercial (Use Classes A1-A5) and 1,450 sqm community / leisure floorspace (Use Classes D1-D2), land for a two-form entry primary school (Use Class D1), public open space, allotments, new sports pitches and associated facilities, drainage, parking and associated access, infrastructure, landscape, ancillary and site preparation works, including demolition of existing buildings and part removal of existing runway hardstanding." (ref. F/4/20/OUT).

- 1.8 The application site is not within an area designated for environmental, ecological or heritage purposes, and is not in an area identified as being at risk of flooding.
- 1.9 Heritage assets within 2.5km of the site are detailed at Figure 2 of the Scoping Request. This includes several listed buildings, the Scheduled Monuments of Tottington Priority (to the north) and Mediaeval Earthworks at Church Farm (to the south). In addition to those assets identified in the Scoping Request, Yapton Conservation Area lies some 1km to the west, and Lyminster Conservation Area some 2.5km to the east.
- 1.10 A number of Public Rights of Way are located in the vicinity including a footpath which extends along the site's northern boundary. The South Downs National Park is some 2.3 kilometres north of the site, and a number of environmental designations are located in the wider locality (Climping Beach SSSI, Arundel Park SSI, Fairmile Bottom SSSI, Arundel Banks SSSI, Felpham SSSI, Bognor Reef SSSI, Duncton and Bignor Escarpment SAC, Arun Valley SPA/Ramsar Site, and Pagham Harbour SPA/Ramsar Site).

2. Planning History

- 2.1 In January 2015, planning permission WSCC/096/13/F was granted by the County Council for the operation of a waste treatment facility comprising a reception and pre-treatment facility/materials recovery facility (MRF), and energy from waste (EfW) facility making use of residual waste through gasification. The proposed facility is permitted to manage up to 200,000 tonnes of waste per annum, of which the applicant indicated approximately 60,000 tonnes would be recycled in the facility, and the residual fraction of 140,000 tonnes processed by the EfW to produce electricity. This permission was subject to a S106 legal agreement that controlled the number, timing, and routing of HGV movements related to the site.
- 2.2 To date, this development has only been partially implemented, namely the limited operation of the MRF facility (approximately 20,000-25,000 tonnes per annum) which the operator confirmed was to establish the scale of demand and nature of local waste streams.
- 2.3 Subsequently, in August 2019 planning permission WSCC/027/18/F was granted by the County Council for a new access, and variations to the legal agreement to allow increased HGV movements to/from the site, varied permitted hours of HGV movements, and requires all HGVs be routed via Ford Road/Church Lane.
- 2.4 As a result of the 2019 permission, up to 120 HGVs can enter/leave the site each weekday (240 HGV movements), and 60 on Saturdays (120 HGV movements). HGVs can travel to/from the site between 0600 and 2200 on weekdays, and between 0800 and 1800 on Saturdays.

3. Proposal

- 3.1 The proposal is set out at section 3.0 of the Scoping Request and comprises a new Energy from Waste facility (EfW) and Waste Transfer Station (WTS). In the context of the extant permission for the site, the key physical differences are:

- the proposed change in the type of thermal treatment technology from gasification to moving grate incineration;
 - a new main building of some 47m in height (extant permission 22m in height) with a single stack of some 80m in height (extant permission 2 stacks at 50m in height); and
 - a new 14m tall WTS to the west of the site (extant permissions involved the upgrade of an existing building on site some 12m in height).
- 3.2 The proposal would result in the complete demolition of all buildings on site, followed by the phased delivery of a new WTS and EfW facility, with a construction period of a total of some 4 years.
- 3.3 As per the extant permissions (WSCC/096/13/F and WSCC/028/18/F), the proposed development would route all HGVs to/from the south east via Ford Road/Church Lane to the A259. No increase is sought to the maximum permitted 120 HGV trips per day (240 movements), albeit the planning permission has not been implemented in full, and the site is operating at around one tenth of the permitted capacity.
- 3.4 The proposed EfW would accept some 275,000 tpa of non-hazardous/non-recyclable residual commercial and industrial waste, and produce some 28MW of electricity for export to the National Grid, and potentially heat for distribution/use locally. The facility would produce some 72,000 tpa of bottom ash which would could be recycled to produce a secondary aggregate, and some 12,000 tpa of residues from the treatment of flue gasses.

4. Scope of the Environmental Statement

- 4.1 Every Environmental Statement (ES) must provide a full factual description of the development, and consideration of the 'main' or 'significant' environmental effects to which the development is likely to give rise. The ES should, wherever possible avoid the use of jargon and be written in easily-understood language.
- 4.2 Every ES must also contain the information set out in Regulation 18 of the EIA Regulations, along with such information from Schedule 4 of the Regulations as is reasonably required to assess the effects of the project. With reference to Regulation 18 and Schedule 4, the ES should contain (in summary), as a minimum:
- a full description of the development, including physical characteristics and land-use requirements, during both construction and operation;
 - a description of the likely significant effects of the project on the environment, and the methodology used to predict them;
 - features of the development or measures envisaged to avoid, prevent, or reduce, and if possible, offset likely significant adverse effects on the environment. All mitigation relied upon for the purposes of the assessment should be clearly detailed in the ES, along with mechanism to secure it;
 - a description of the reasonable alternatives relevant to the proposed development and its specific characteristics, and reasons for the choice made. In this case, a clear, detailed comparison will be required of the site chosen, type of facilities and technology to be used, and alternative designs (e.g. consider smaller scale expansion and design/height of the

buildings and stack, and what options, if any, may be available minimise their scale);

- *“A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge;”*
- a non-technical summary; and
- a statement from the developer outlining the relevant or qualifications of the competent experts who have prepared the ES.

4.3 In accordance with Regulation 18(4), the ES must also:

- be based on this Scoping Opinion (or if updated, the most recent Scoping Opinion issued);
- include information *“reasonably required for reaching a reasoned conclusion on the likely significant effects on the environment”*, taking into account current knowledge and assessment method; and
- to avoid duplication, take account of the results of any relevant UK environmental assessment which is reasonably available.

4.4 Any updated requirements set out in the Planning Policy Guidance: Environmental Impact Assessment should also be taken into account.

4.5 The 'baseline' for the proposals is considered to be the existing environment, subject to the current operation of the facility. However, the fall-back position allowed under the extant planning permissions ref. WSCC/096/13/F and WSCC/027/18/F. (see below for more details).

4.6 The EIA should take a 'Rochdale Envelope' approach to considering the development, with a 'worst case scenario' assessed, so that anything less can be considered acceptable.

4.7 The following sets out the County Council's views as to the main issues which will need to be considered in an ES relating to the development, with reference to the submitted Scoping Request. It does not prevent the County Council from further requests for information at a later stage under Regulation 25 of the EIA Regulations, if deemed necessary.

General Matters

4.8 The context of extant planning permissions and previous EIA assessments submitted in relation to the site are of relevance to the proposed development. However, it is also important to consider the existing baseline, noting that the approved development has not been implemented in full. Accordingly, it will be crucial that the submitted ES clearly sets out the baseline against which assessments are made, and presents clear scenarios for potential impact.

4.9 Where appropriate, assessments should draw upon data/information considered in previous EIAs, repeating, updating or re-assessing where necessary.

- 4.10 In this regard, as an overall approach, it will be important for the ES to consider and clearly set out:
- the existing baseline (i.e. as it is today);
 - predicted impacts (i.e. the potential impacts over and above the baseline arising from the proposed development);
 - predicted cumulative impacts (i.e. taking into account the possible cumulative effects with other development in the locality); and
 - a comparison against the original development should that have been taken forward - i.e. a comparison of impacts against the fall-back position. The ES should clearly set out and justify what, from the approved development, is considered to have a 'realistic possibility' of coming forward and has therefore been considered to represent the fall-back position.
- 4.11 Given the time that has passed since previous EIA applications, significant change in the development over the extant permissions, and possible changes to the baseline since their consideration, it will be crucial that the submitted ES presents up-to-date information, paying particular attention to any changes in baseline circumstances and significant development proposed in the locality, most notably the development of strategic development sites allocated as part of Arun Local Plan 2018 (key of which are sites SD7 (Yapton), SD8 (Ford) and SD10 (Climping)), and now forming part of current application (ref. F/4/20/OUT).

Air quality and climate

- 4.12 The matters set out in your Scoping Request are considered generally appropriate and adequate. However, contrary to that set out in Table 5.2, and with reference to the general matters raised above, consideration of potential impacts arising from road traffic emissions, in particular in combination effects, should be scoped in.
- 4.13 With regard to paragraph 5.6, taking into account the phased nature of the proposals (whereby the WTS could be operating during construction), it is not clear whether identified thresholds would be exceeded if construction and operation are undertaken together. The potential impact of these combined operations on air quality should be assessed.
- 4.14 It will be crucial that you can demonstrate that the development would not result in emissions that give rise to significant impacts on human health and conform to all relevant EU, national, and local objectives/limits for air quality. It will be important that this is presented in plain English.
- 4.15 Assessments of emissions to air from the selected technology should be supplemented with data from similar plants. Reference should be made to the air quality controls and monitoring measures required by the Environmental Permitting process.
- 4.16 The design of the stack (in particular diameter/height) and its relationship with corresponding emission dispersal requirements should be fully explained. The height of the stack should be defined as early in the process as possible so that

the building design and site layout can be fixed, and the implications for landscape and visual impact in particular considered.

- 4.17 The impacts on air quality in combination with those from nearby land uses should also be taken into account. A full review of all substantive, and/or sensitive future development in the immediate locality, should be undertaken, including those with planning approval, but which have yet to be implemented.
- 4.18 With regard to potential for odour and dust during operation, noting the likelihood for putrescible waste to be managed at the site, the site's location next to a waste water treatment works, and taking into account the future development now likely in the immediate locality, contrary to the conclusion in Table 5.2, an assessment of the potential odour and dust impacts must be scoped in. Given the proposed 4 year duration of construction works and phased delivery of the development, this should include assessment of the combined impact of construction and operational impacts on air quality.
- 4.19 The submitted information includes outline details of proposed mitigation measures to be included to control dust and odour; however, whether this would apply to both the WTS and EfW is unclear (only 'tipping hall' referred to). All proposed mitigation measures relied upon for the purposes of the assessment should be clearly detailed in the ES, along with mechanisms to secure it. It is recommended that operational odour and dust management schemes and an outline Construction Environment Management Plan (CEMP) are included in the ES so that the mitigation measures within it can be considered.
- 4.20 Consideration of measures to reduce emissions from HGVs should also be considered.
- 4.21 The assessment should take into account [Air Quality and Emissions Mitigation Guidance for Sussex \(2020\)](#) which requires increased emissions to be avoided, mitigated, or offset. A damage cost calculation will be required with the submission, along with a mitigation plan to offset the impacts, which should feed in to the Air Quality section of the ES.
- 4.22 With reference to paragraph 5.17, data to be used to establish the air quality baseline, will need to be agreed in advance with Arun District Council's Environmental Health Officer (EHO), along with any requirements for further monitoring data. The sensitive receptors potentially impacted by emissions from the new stack and other operations should be agreed with the EHO, and should include both human and sensitive ecological receptors (see Ecology section below).

Carbon/Greenhouse Gas Emissions

- 4.23 It is noted that climate change and in carbon/greenhouse gas emissions are proposed for inclusion in the air quality topic chapter. Such matters should be considered separately to air quality considerations as the issues assessed are distinct.
- 4.24 The Carbon/Greenhouse Gas Emissions chapter should clearly assess whether the development would result in reduction in greenhouse gas emissions, in particular as a result the diversion and recovery of energy from residual wastes which may otherwise have gone to landfill (supported by an R1 assessment), and the measures to minimise impacts on climate change, including use of renewable energy, minimising the use of resources, control over vehicular fleet

emissions, and potential local heat users. It should also identify the potential impact of climate change on the facility, if any.

Community, Social and Economic effects

- 4.25 Given the focus of this chapter will seemingly be on the potential for post construction health effects, and noting the comments of Public Health England (dated 13/02/20), as well as the comments below in relation to scoping out various effects, it is considered that rather than a 'community, social and economic effects' chapter, this should relate entirely to Health Impacts. Drawing upon the relevant issues, this chapter section should summarise key information, risk assessments, proposed mitigation measures (including approaches to minimise public exposure to air pollutants, and maximise mitigation/co-benefits), conclusions and residual impacts, relating to human health.
- 4.26 Alternatively, it may be possible to provide a dedicated Health Risk Assessment to provide a robust and quantitative assessment of health risks posed by the proposed development.
- 4.27 Contrary to that set out in table 6.2, it is considered that there may be some potential for impacts upon, housing supply, education and local services, microclimate (in particular overshadowing) and potentially tourism, particularly given the strategic allocations proposed in the immediate locality. The extent, to which they may be affected, as a minimum, must be proportionately considered, in relevant corresponding sections (e.g. landscape and visual, air quality, noise, cumulative impacts).
- 4.28 With regard to table 6.2, it is accepted that the proposal is not likely to result in significant employment/economic effects on the area, therefore this can be scoped out of consideration in the ES. However, employment generation must be made clear in the Planning Statement and potential contributions quantified.

Cultural Heritage

- 4.29 The matters set out in the Scoping Request are considered generally appropriate and adequate.
- 4.30 As set out at section 7.7, consideration should be given of the visual impact of the development on heritage assets. The scale, mass and height of the proposed development (and stack) are such that potential for impact upon the setting and views from/to heritage assets can be expected from considerable distances. The assessment should consider all heritage assets where there may be an impact, even if less than substantial. A Heritage Visual Impact Assessment (HVIA) must be provided, including "before and after" photomontages showing views to and from key designated heritage assets. The relevant assets should be informed by consideration of a Zone of Theoretical Visibility (ZTV) and should cross reference with the landscape and visual assessment as appropriate.
- 4.31 In addition to those heritage assets identified in Figure 2 and the Scoping Report, the assessment should include the impact on wider Conservation Areas (e.g. to include Lyminster) and Tortington Priory (a Scheduled Monument), and the elevated "heritage ridge line" of Arundel to the north, including the Keep of

Arundel Castle (Scheduled Monument), Grade I Listed Buildings of St Nicholas' church and Arundel Cathedral).

4.32 With reference to the comments of the County Archaeologist (10/02/20), the proposed assessment should include consideration of:

- Above and below ground military structures. This should include historical mapping and aerial photograph-related regression to illustrate the evolution of the pre-airfield and military airfield landscape. Suitable mitigation measures should be included where appropriate.
- Below ground remains of the Portsmouth to Arundel Canal and its historical alignment. This should include impacts on the buried canal, and suitable mitigation measures. It should be noted it is possible the original artificial clay lining of the canal survives below its backfill and development-related excavation (e.g. foundation) works that might breach that lining could have cross-cutting hydrological implications.
- Below-ground archaeological remains of later prehistoric or Roman date, in parts of the site where there appears to be little depth of made ground. Suitable mitigation measures should be included where appropriate.
- Geoarchaeology. This should include both an assessment of the Ice-Age Sussex Raised Beach and river terrace sequence, and below-ground geoarchaeological deposits within the site (relating to Ice-Age former coastlines and the possibility of contemporary human occupation and associated artefacts).

4.33 In addition to designated assets, the assessment should also consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place.

4.34 The assessment should take account of the potential impacts of construction and associated traffic, might have upon perceptions, understanding, and appreciation of the heritage assets in the area.

4.35 It is strongly recommend that the Heritage Assessment is the subject of continued discussion with the County Archaeologist (John Mills, 0330 2226 445; john.mills@westsussex.gov.uk).

Ground Conditions

4.36 Contrary to the intention to scope out this topic, to ensure a comprehensive EIA and consideration of the interrelationship between all impacts, the EIA must include consideration of impact of/on ground conditions so this should be scoped in.

4.37 It is accepted that, in part, ground conditions have been explored as part of the ES submitted for WSCC/096/13/F which concluded limited potential for significant impacts upon the environment. However, such assessments must be reviewed in the context of the waste development/operations which have taken place on site since that time, must be updated in accordance with the latest guidance/standards, and take into account the substantial change in proposed development (which is likely to require significantly different, and /more

substantial ground works, and the demolition of large buildings of an industrial nature).

- 4.38 Such assessments should give due regard to [‘Model Procedures for the Management of Land Contamination’ \(CR11\)](#), the Environment Agency’s [‘Guiding Principles for Land Contamination’](#), and the [contaminated land](#) pages on the government website.
- 4.39 With reference to the comments of the Environment Agency (14/02/20) a Phase 1 investigation will be required, undertaken in accordance with current best practice, and which will need to address any potential impacts arising from the identified legacy fuel tank, potential for creation of preferential pathways, groundwater levels, and provision to deal with any unknown contamination at the site.
- 4.40 Any mitigation measures set out in site investigation reports should be taken into account in the ES, particularly in relation to intrusive ground works, but also the removal of buildings which could contain hazardous or contaminated materials. The measures set out may affect the project design and programme, and may impact upon the surface water environment so should be considered at an early stage.

Land use and land take

- 4.41 It is confirmed that land use and land take does not require a specific section within the ES so can be scoped out, albeit all potential impacts on nearby receptors (existing and future) should be considered in the relevant topic areas.

Landscape and Visual Impact

- 4.42 The approach to assessing landscape/visual impact is generally considered appropriate.
- 4.43 Given the potential height/scale of the stack and buildings proposed, the development has the potential to be visible from a wide area beyond the site, to a far greater degree than adjacent or approved developments. The Assessment will therefore need to consider built structures, lighting, and plumes, as well as more general impacts through disturbance and should include a clear assessment of the impact on the skyline, topography, through overshadowing, and on views into and out of the site.
- 4.44 As set out at paragraph 10.11 of the Scoping Report, the application must be accompanied by a Landscape and Visual Impact Assessment (LVIA) based on the third edition of Guidelines for Landscape and Visual Impact Assessment (2013)(GLVIA). The findings of the LVIA should feed into the Landscape and Visual Impact chapter in the ES.
- 4.45 With reference to the comments of the WSCC Landscape Architect (17/02/20) the assessment will need to consider all relevant Landscape Character Assessments at a National, County and District level, and also consider impacts on relevant character areas and viewpoints within the South Downs National Park and Marine Character Areas.
- 4.46 As set out in the Scoping Report the assessment will require consideration of all areas where the proposal would likely be visible, for which a ZTV and Zone of Visual Influence (ZVI) should be established. It should be clear to what extent existing vegetation and buildings has been taken into account in the ZTV/ZVI.

- 4.47 Representative viewpoints should be agreed with County Planning once the ZVI has been established. Such viewpoints will need to include, landscape, visual and heritage receptors and be representative of susceptible receptors e.g. valued landscapes and views (as identified in in Landscape Character Assessments, Neighbourhood Plans, Village Design Statements, Conservation Area appraisals), surrounding PROW and Publically accessible spaces (including Ford Market and Plating Fields), from nearby residential dwellings (including future residents of the surrounding Arun District Council allocation site), and transport corridors.
- 4.48 Thereafter verified visualisations, photomontages and 3D models must be provided, prepared in accordance with GLVIA guidelines. Viewpoints should also examine the potential effects of the proposed built form on any valued views (as highlighted in landscape character studies, neighbour plans, conservation area appraisals etc.) either by obscuring or detracting from it. Visualisations should also take in to account the effect of the plume, materials/finishes and any lighting.
- 4.49 The impact of the development in its entirety should be considered, including all new buildings/structures, any changes in land levels, landscaping (including any bunds which may be proposed), outside storage of materials, fencing and lighting, including of the stack. If planting is proposed (either on or off-site), consideration should be given to any mitigation effects at year 1, and then at 5 yearly intervals sufficient to demonstrate the effectiveness of the mitigation proposals over time. Views into the site during winter months should be assessed as a 'worst case scenario' when vegetative screening is least effective. The scope of the assessment should include an assessment of visual impact, and impact on the landscape, of HGVs travelling to/from the site.
- 4.50 For completeness, it is recommended that the outcome of the arboricultural survey, and a proposed landscaping scheme are included within this section of the report. These matters are particularly relevant to assessing the impact of the development and extent to which any such impacts may be mitigated.
- 4.51 The height and design/finish of the stack, and the potential scale of the plume (both extent and period when it would likely be visible) should be established as early as possible in the process so that this can feed into considerations of landscape and visual impact. If there is any doubt over the stack height, a 'worst case scenario' should be presented.
- 4.52 Given the proximity to both existing and future proposed development, the LVIA should also include details of lighting and a plan showing post-development lux levels to confirm light spill from the site. If required, any lighting on the stack must be identified and considered in the LVIA. Particular account should be taken of the 24-hour operations that are typical of an EfW facility, compared with the operating hours of the existing facility and that on nearby sites.

Major accidents /disasters

- 4.53 It is confirmed that accidents/disasters does not require a specific section within the ES and can be scoped out, albeit all potential impacts on nearby receptors (existing and future) should be considered in the relevant topic areas.
- 4.54 Of particular relevance is consideration of potential risk of accidents arising from the operation of a facility managing the receipt and burning of waste, and likely fuel/chemical/hazardous residue storage on site should be considered,

particularly in relation to impacts on air quality and the water environment. Any site security should also be detailed, particularly if it would give rise to a visual impact.

- 4.55 Any aviation safeguarding matters should be addressed in the Planning Statement.

Natural Heritage

- 4.56 Contrary to the intention to scope out this topic, it is considered there is the potential for significant effects on habitat and species, particularly with reference to the comments of Natural England. Such evidence will also be important to inform the Habitats Regulation Assessment (HRA) Screening process.
- 4.57 The development is significant in scale, with the potential to result in significant emissions to air and water, as well as noise and light impacts. This therefore has the potential to affect biodiversity in the area.
- 4.58 The potential impacts upon the Duncton to Bignor Escarpment Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), Ancient Woodland priority habitats nearby and potential impacts to grazing marsh / functional Land to the Arundel Valley SAC/Special Protection Area (SPA) should be clearly assessed. Impacts on other SSSI's and Local Nature Reserves which may be affected by this proposal should also be considered. Proposals for mitigation of any impacts and, if appropriate, compensation measures also need to be included.
- 4.59 An ecological appraisal should be included, with any further assessment to be agreed with the County Ecologist to understand whether the preliminary assessments undertaken to date are sufficiently comprehensive, and confirm whether further surveys and evaluation is required.
- 4.60 In addition to matters raised in the Scoping Report, proportionate assessments of potential impacts upon all existing retained trees/vegetation/habitats and, where appropriate, the measures that are proposed to ensure their retention. It may be possible that this is incorporated into Landscape and Visual chapters, however, it will nonetheless be important to summarise any biodiversity impacts within this chapter, and demonstrate biodiversity net gain.

Noise and Vibration

- 4.61 As set out in the Scoping Report, it is considered Noise and Vibration must be scoped in.
- 4.62 As alluded to at paragraph 13.4, a number of strategic housing sites allocated in the Arun Local Plan 2011-2031 fall in close proximity to the application site, including the site the subject of a current application for outline planning permission (ref. F/4/20/OUT). Accordingly, and noting the nature of activities proposed (which includes 24 hour operations) and the significant length of the proposed construction process, the potential for noise and vibration impacts on both existing and future receptors, both during construction and operation, must be scoped in. Contrary to paragraph 13.6 of the Scoping Report, noting the proximity of the site to land allocated for future housing, consideration of potential vibration impacts arising from construction should be scoped in. This

information will also provide useful context for helping shape any future proposals on neighbouring land and guide possible buffer zones.

- 4.63 Given the proposed four year duration of construction works and phased delivery of the development, this should include assessment of the combined impact of construction and operational noise and vibration impacts.
- 4.64 Noise emissions from the selected technology, and operational activities (e.g. reversing alarms/ on site HGV movements) should be supplemented with data from similar developments. The noise impacts in combination with those from nearby land uses should also be taken into account. The type of plant and machinery to be used at the site, any external operations, and the hours of operation of the site should be clarified as early in the process as possible so that the noise emissions resulting from operations at the site can be assessed, along with the visual impact of any potential mitigation measures (e.g. bunds, acoustic fencing).
- 4.65 Contrary to that set out at paragraph 13.5 of the Scoping Report, potential noise/vibration impacts arising from HGV traffic should be considered. In this regard it should be noted that the route of the access along the former airfield service road is flanked by land allocated for housing, and that additional operational traffic (over and above that previously considered/permitted) is now proposed. As a result the potential impacts upon these receptors should be considered.
- 4.66 Further, potential noise impacts from HGVs are likely to be considerably greater than that of typical traffic, and as a result should be addressed. In addition to Institute of Environmental Assessment Guidelines, the assessment should include consideration of the Design Manual for Roads and Bridges, Volume 11.
- 4.67 If mitigation measures are required, these should be incorporated into the design of the building and layout of the site at the earliest stage so the implications can be considered in terms of landscape and visual impact. As a minimum measures should be identified to mitigate the effects on identified sensitive receptors (e.g. an operational noise management plan and CEMP).
- 4.68 Noise/vibration sensitive receptors and the scope of baseline and predictive noise assessments should be agreed with Arun District Council's Environmental Health Officers. Receptors should include public rights of way closest to the site, future allocated uses surrounding the site, and all receptors where there would be a perceptible change in the noise environment.

Traffic and Transport

- 4.69 Contrary to the intention to scope out this topic, it is considered Traffic and Transport must be scoped in, noting the comments above that the proposal represents an increase in the already significant levels of traffic allowed in the approved development, and the proximity of allocated housing and other sensitive uses. There is therefore considered to be the potential for significant effects.
- 4.70 As set out at paragraph 4.8, it will be crucial that the submitted ES draws upon data/information considered in previous EIAs/TAs, repeating, updating or re-assessing where necessary. In this regard it is noted, however, that the proposals are considerably different from that previously consented, involving both an EfW and a WTS that could operate independently, the use of larger vehicles (it is of note that the reasoning presented for an increase in HGVs

permitted for the new access was to “allow most of the input to the Materials Recovery Facility (MRF) to come to the site by smaller lorries, such as Refuse Collection Vehicles (RCVs) or Roll-on/Roll-Off (RoRo), rather than bulkers”) and would result in a considerable increase in car and LGV movements (from 94 to 223 movements).

- 4.71 Further, in light of local growth, approved and current development, the assessment should present an updated baseline position. Of particular relevance in this regard are the approval of strategic developments at Climping and Yapton, and the recent application submissions for land at Ford, all of which could impact on the proposed route of HGVs to from the site (including off-highway access roads).
- 4.72 It is understood the applicant is currently seeking further pre-application advice regarding the scope of any required Transport Assessment which is supported. The applicant will need to consider and incorporate any advice provided by the Highway Authority in this regard.
- 4.73 The ES must identify a realistic planning fall-back position for existing vehicle movements and their routing to/from the site, as well as a baseline relating to the existing situation, from which potential impacts should be assessed. Proposed vehicular, types, numbers, frequency and routing should all be set out as necessary.
- 4.74 The potential impact of the facility on non-motorised users should be clearly set out, and opportunities for increasing sustainable transport modes, both for site employees/visitors and surrounding land uses, should be specified.

Waste and Natural resources

- 4.75 It is confirmed that waste and natural resource does not require a specific section within the ES, albeit all potential impacts relating to contamination, hydrology and upon nearby receptors should be considered in the relevant topic areas.

Water Environment

- 4.76 The approach to assessing the impact on the water environment is generally considered appropriate.
- 4.77 With reference to the comments of the Environment Agency (14/02/20), a Hydrological Risk Assessment will be required, based on the findings of the Phase 1 contamination investigation. This risk assessment must include the potential impact from any penetrative works and potential to create preferential pathways for contaminants to reach groundwater. This should clarify the extent and nature of any change in levels on site and detail of proposed foundations.
- 4.78 The Scoping Report suggests surface water will be discharged to surface water via an interceptor and that foul drainage will continue to be handled by the current foul drainage provider. Contrary to that set out at table 16.2 of the Scoping report, the ES will need to demonstrate that an increase in the intensity of operations at the site would not result in a risk to controlled waters via either/or increased run off and /or potential contamination of the run off. This should include details of the safe storage of materials, chemicals, fuels, oils and hazardous materials which could pose a risk to controlled waters if a spillage were to occur.

- 4.79 With reference to the comments of WSCC as Lead Local Flood Authority (17/02/20), the Flood Risk Assessment and Drainage Strategy in support of any planning application to comply with the West Sussex LLFA [policy](#) for the Management of Surface Water. Any FRA should include consideration of climate change. Further guidance can be found on the gov.uk website [here](#).
- 4.80 The applicant will be expected to demonstrate a 50% betterment in terms of reduction in discharge rates for the proposed brownfield development. A clear outline Drainage Strategy must be prepared, accompanied with appropriate plans setting out all drainage features, any silt management, all process water usage, and any discharge points, with the results feeding into the EIA.
- 4.81 The scope for roof drainage to be directed to infiltration structures should be explored in accordance with the SuDS hierarchy, noting that the EA's permission would be required because of the presence of the principal aquifer beneath the site. If infiltration structures are possible, evidence of winter groundwater and soakage tests to support of any decision regarding infiltration should be provided. Pollution prevention upgrades based upon the CIRIA SuDS guidance (SuDS Manual C753) are encouraged.
- 4.82 With reference to the comments of Southern Water, development capacity assessments will be required to determine if the existing sewerage system can accommodate the proposed development flows.
- 4.83 Reference to controls and monitoring measures for and discharges off site and storage/containment of materials as required by the Environmental Permitting process should be made.

Cumulative Effects and alternatives

- 4.84 The approach to assessing cumulative effects is generally considered appropriate.
- 4.85 However, it is recommended that the cumulative impacts of the development should take into account all approved and allocated large scale development within at least a 5km radius of the site where they would likely result in large volumes of vehicular movements on Ford Road/Church Lane & its junction with the A259, would have the potential to significantly alter the character of the local landscape, or could give rise to substantive cumulative air quality impacts.
- 4.86 In addition to those developments identified at paragraph 17.3 and 17.4 of the Scoping Report, the applicant's attention is drawn to the following planning applications recently submitted to Arun District Council:
- [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, and;
 - [F/4/20/OUT](#): Outline planning application (with all matters reserved except for access) for the development of up to 1,500 dwellings (Use Class C3), 60-bed care home (Use Class C2), up to 9,000 sqm of employment floorspace (Use Classes B1), local centre of up to 2,350 sqm including up to 900 sqm retail / commercial (Use Classes A1-A5) and 1,450 sqm community / leisure floorspace (Use Classes D1-D2), land for a two-form entry primary school (Use Class D1), public open space, allotments, new sports pitches and associated facilities, drainage, parking and associated access, infrastructure, landscape, ancillary

and site preparation works, including demolition of existing buildings and part removal of existing runway hardstanding).

- 4.87 These applications, form part of proposals for the development of the 'Ford' strategic housing allocation sites SD8 (Ford), which surrounds the proposed site and in part, propose to share the sites access from Ford Road. It is of note that at present the applications do not cover the full extent of the allocated land, however, with reference to the relevant chapters/assessments, the ES will need to clarify any assumptions that have been made in respect of potential impacts upon future development (e.g. any stand-off, buffer zones, or mitigation). As far as possible this section will need to reflect the status of future strategic allocation development proposals which are likely to come forward at the same time as the proposed development. Close liaison with both the developer of that site and Arun District Council are advised.
- 4.88 With reference to the comments of Arun District Council, your attention is also drawn to the Preferred location for a new 10 Form Entry Secondary School to the north west of the site. The potential cumulative effects on this school development should also be considered.
- 4.89 The cumulative impact of the development alongside existing facilities in the area must be considered (e.g. the Ford Materials Recycling Facility, Waste Water Treatment Works, Rudford Industrial Estate, approved Wick Farm Anaerobic Digestion facility), particularly where these result in large HGV numbers, and/or other impacts.
- 4.90 As set out at paragraph 17.7 of the Scoping Report, the interaction of effects and potential to give rise to a cumulative effect will need careful consideration. A full consideration of the implications of the whole scheme should be included in the ES.

Alternatives

- 4.91 It is noted that the cumulative impact section would also address 'alternatives'. Such matters are separate from cumulative effect considerations, accordingly, the applicant should address this in an independent section. As well as alternative site layouts and designs, this section should clarify why the revised EfW is being sought, rather than the approved gasification/MRF facility; why another type of waste facility is not being sought; and why a front-end MRF has not been included (compared with the approved development).

5. Conclusion

- 5.1 As already noted, in accordance with Regulation 18(4) of the EIA Regulations, the submitted ES must be based on this Scoping Opinion (or the most recent Scoping Opinion relating to this project).
- 5.2 It is recommended that in addition to the above, the responses from consultees forwarded to you directly, should be reviewed.

Signed:



James Neave
Case Officer

Signed:



Jane Moseley
Reviewer

for the Head of Planning Services
Date: 13 March 2020

Appendix 3

Scoping Consultation Responses, February – May 2020

James Neave
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e-mail: claire.potts@arun.gov.uk

26 February 2020

Please ask for: Claire Potts

Your Ref:

Our Ref: F/... /20/EIS

Dear James

**Town and Country Planning (Environmental Impact Assessment) Regulations 2017
Request for Scoping Opinion under Regulation 15**

**Proposed Energy Recovery Facility and Waste Transfer Station at Ford Circular
Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY**

Thank you for consulting Arun District Council on a request for a Scoping Opinion, made by Grundon Waste Management Ltd and Viridor, for an Environmental Statement in respect of the above proposed development. The EIA Scoping Report by Terence O'Rourke Ltd, dated January 2020, has been examined and the District Council's comments are set out below.

With the exception of the access road and a small piece of land attached to the north-west corner, the site is identified on the Policies Map of the adopted Arun Local Plan 2011-2031 as a Strategic Waste Site Allocation, due to it being allocated in the West Sussex Waste Local Plan (April 2014). Policy WM DM1 of the Arun Local Plan 2011-2031 states that "...there will be a general presumption against any development which may harm or prejudice the operation of existing and allocated waste facilities and infrastructure".

The land surrounding the site is identified on the Policies Map as a Strategic Housing Allocation. Policy H SP2c of the Local Plan states that the Ford Strategic Allocation will provide at least 1,500 dwellings over the plan period. The policy contains a list of key design and infrastructure requirements, which include considering the siting of Ford Wastewater Treatment Works, but not specifically the Strategic Waste Site.

The proposed development is described in section 3 of the EIA Scoping Report. It is noted that:

1. The existing buildings on the site will be demolished to make way for an Energy Recovery Facility (ERF) and a Waste Transfer Station (WTS).

2. The ERF is likely to be accommodated in a building approximately 47m high, with a single stack up to 80m high. It will process up to 275,000 tonnes per annum of non-hazardous non-recyclable residual waste. It will generate approximately 31 MWe (gross power), of which 28 MWe will be exported to the National Grid. Ultimately, it is intended that heat generated from the ERF will be transferred off site to local users through a combined heat and power (CHP) network.
3. The WTS building is likely to be in the region of 14m high and will be situated to the west of the main ERF building. The WTS will process up to 20,000 tonnes per annum, two thirds of which will go on for further treatment/recycling elsewhere and the remaining third will be transferred to the ERF.
4. There will be a range of smaller ancillary buildings and structures.
5. Car parking for staff and visitors will all be on-site.
6. Access to and from the site, during both construction and operation, will be obtained from the recently constructed new access road that links the south east corner of the site with Ford Road south of Rodney Crescent.
7. The number of HGV movements will not exceed those permitted under the planning permission for the new access road.
8. Table 18.1 identifies the environmental features that are likely to be significantly affected by the proposed development and which should be included within the EIA.

Feature	Potential effects that are likely to be significant
Air quality and climate	Generation of emissions from process plant post-construction
	Increased nitrogen and acid deposition at designated nature conservation sites as a result of process plant emissions
	Increase in dust during construction and effects on air quality and local amenity
	Effect on greenhouse gas emissions
Community, social and economic effects	Effects on health post-construction
Cultural heritage	Impact on archaeological remains on site during construction
	Change to settings of scheduled monuments in the vicinity of the site during and post-construction
	Change to settings of listed buildings in the vicinity of the site during and post-construction
	Change to settings of conservation areas in the vicinity of the site during and post-construction
Landscape and visual effects	Impact on Ford Airfield military structures during construction
	Change to landscape character of the site and effects on surrounding landscape character areas
Noise and vibration	Change to sensitive views, including from designated landscapes
	Generation of noise during site preparation and construction
Water environment	Generation of plant and activity noise post-construction
	Pollution of surface water during construction
	Pollution of groundwater during construction
Change in groundwater hydrology / recharge during construction	

Table 18.1: Effects that are likely to be significant

Having regard to the Scoping Report and the above table, the following matters give rise to concern.

Air quality and climate – Odour

There is concern about the potential generation of odour from waste handling operations post-construction. Given the increase in size of population likely to be living within proximity of the site, as a result of the strategic housing allocation, and the amount of waste that will be processed, odour could become a significant issue. It is considered that this should be included within the scope of the EIA.

Community, social and economic effects – House Prices

It is unknown whether the study mentioned in paragraph 6.7 of the Scoping Report is directly comparable with the Ford site in terms of the size of the proposed facility, its setting and the proximity of existing and proposed housing. The study also appears to be rather dated, having been undertaken 15 years ago.

Community, social and economic effects – Micro-climate

Table 6.1 contains a comment that “the nature and scale of the proposed development mean that there is no potential for microclimate effects”. The ERF is likely to be accommodated in a building approximately 47m high and the WTS building is likely to be in the region of 14m high. Such buildings are clearly not small in scale. The distance between these buildings and the new housing is not yet known. Nor has the precise use or uses of land adjoining the site yet been established. Micro-climatic effects, such as overshadowing and wind, should not be lightly ignored.

Ground conditions

It is noted that ground conditions will not be considered in the ES. However, a geo-environmental desk study report is proposed to be submitted in support of the planning application as a separate document. The Council’s Environmental Health Officer has stated that the contaminated land aspect does not need to be included in the ES provided that there is a reference to it being separately addressed. The Phase I and II reports, mentioned in the Scoping Report, were completed in 2012 and 2015 respectively. Therefore, they cannot be considered current and will require updating.

Land use and land take – Residential

While Chapter 9 of the Scoping Report considers the effects of the proposal on the use of existing public rights of way in the vicinity of the site, it ignores the Local Plan strategic housing allocation. The latter is considered under cumulative effects instead.

Noise and vibration

Paragraph 13.4 recognises “...that new dwellings may be constructed and occupied in the surrounding allocated area before construction of the proposed development is completed. Given the proximity of these receptors, it is considered that there is the potential for a significant effect to occur.”

Paragraph 13.7 adds that "...the development of the allocated residential land surrounding the site will bring dwellings closer to the proposed development. As a result, there is the potential for significant operational noise effects."

Consequently, the effects of noise both during construction and post construction are to be included in the EIA. This approach is supported.

Paragraph 13.8 states that "The nearest existing residential dwellings are approximately 210 m from the site and therefore well beyond any piling impact zone. While new dwellings may be constructed and occupied in the surrounding allocated area before construction of the proposed development is completed, these are not likely to be close enough to be affected by significant vibration from piling."

It is unclear what assumptions have been made about the proximity of new dwellings. New dwellings could be permitted and constructed in advance of the proposed ERF and WTS and could be the subject of significant vibration effects. Therefore, it would be inappropriate to exclude vibration during construction from the EIA.

The Council's Environmental Health Officer is generally satisfied with the proposed inclusion of noise and vibration in the EIA. However, with reference to Table 13.2, they recognise that increased traffic noise during construction (or impact of this on local residents) could be controlled by way of a condition imposed on any planning permission granted but, nevertheless, consider it should be included within the scope of the EIA.

Cumulative effects

Paragraph 17.4 proposes to include the Ford strategic housing allocation site in the cumulative effects' assessment. It should be noted that two planning applications were made to Arun District Council on 20 February 2020, as follows:

1. An application submitted on behalf of Redrow Homes Southern Counties and Wates Development Limited for:

"Outline planning application (with all matters reserved except for access) for the development of up to 1,500 dwellings (Use Class C3), 60-bed care home (Use Class C2), up to 9,000 sqm of employment floorspace (Use Classes B1), local centre of up to 2,350 sqm including up to 900 sqm retail / commercial (Use Classes A1-A5) and 1,450 sqm community / leisure floorspace (Use Classes D1-D2), land for a two-form entry primary school (Use Class D1), public open space, allotments, new sports pitches and associated facilities, drainage, parking and associated access, infrastructure, landscape, ancillary and site preparation works, including demolition of existing buildings and part removal of existing runway hardstanding", and

2. An application submitted on behalf of Ford Airfield Market for:

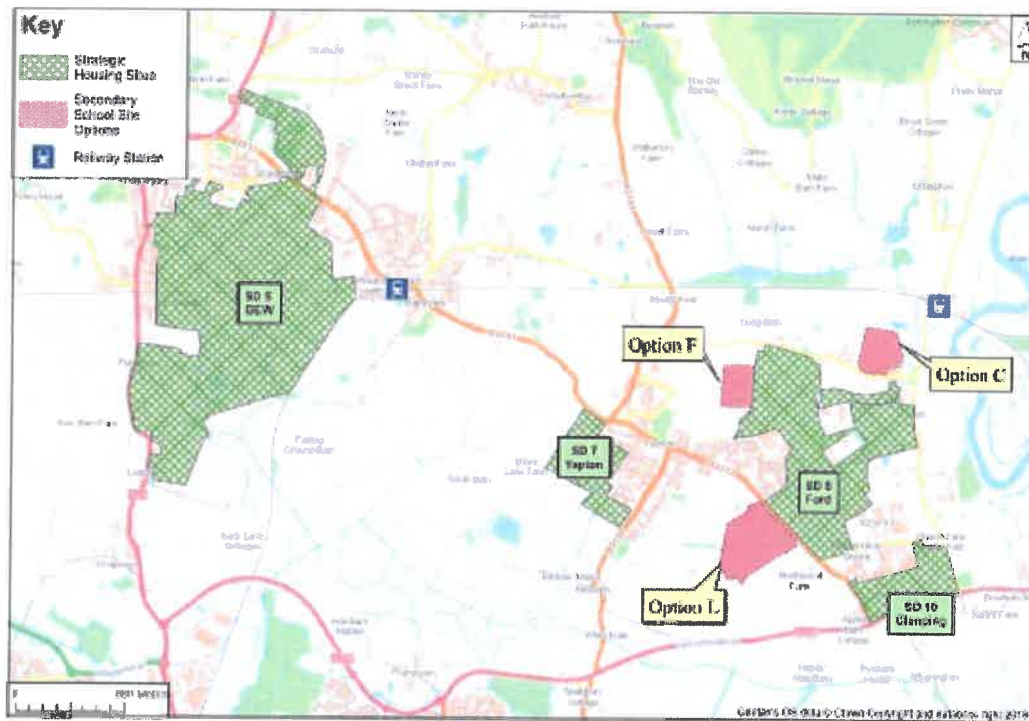
"Full planning application for the reconfiguration of Ford Market, including revised market access, hardstanding for replacement vehicular parking and associated infrastructure, landscape, ancillary and site preparation works".

The applications are currently the subject of validation and registration and will be available to view on the District Council's website shortly. At the time of writing, there are no application reference numbers to give.

The proposals the subject of these two latest applications will need to be added to those identified in paragraph 17.3 of the Scoping Report. The applications do not cover the full area of the Strategic Housing Allocation. However, the EIA will need to assume that the land to north-east and east of the site will also be developed with housing.

An EIA Scoping Opinion (F/19/18/EIS) was provided by Arun District Council on 31 January 2019 for a proposal described as "Up to 1,500 dwellings, up to 37,000 sqm of employment floor space, a local centre including retail, commercial and community facilities, primary school, nursery, a care/retirement home, healthcare facilities, public open space, new sports pitches and facilities, & associated access, infrastructure, landscape & ancillary works" on land at Ford Airfield, Ford. A copy of the Opinion is attached for your information.

Due to the significant growth of development in the District a requirement has been identified to provide a new 10 Form Entry Secondary School in the District. At its meeting held on the 27 February 2019, the District Council's Planning Policy Sub-Committee resolved that Option/Site F be supported as the preferred location for a 10 Form Entry Secondary School to support the Local Plan Strategic Allocations. Option F is shown on the map below.



This proposal will need to be included among the cumulative effects too.

To conclude, it is considered that the scope of the EIA should be extended to include the effects of the proposed development on the use of the surrounding land for housing, employment, retail, commercial, leisure and community uses as envisaged in the Arun Local Plan 2018-2031. The following should be included:

- Odour from waste handling operations post-construction
- Microclimate effects
- Traffic noise during construction
- Vibration during construction
- The cumulative effects of the development of the Strategic Housing Allocations, SD7 Yapton, SD8 Ford, SD10 Climping and the preferred site for a 10 Form Entry Secondary School.

I trust you will find the above comments of assistance in responding to the request for a Scoping Opinion.

Yours sincerely



Claire Potts
Strategic Development Team Leader

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23885/A3/LV/RS

BY EMAIL: james.neave@westsussex.gov.uk

17 February 2020

Dear Mr Neave,

CONSULTATION RESPONSE: REQUEST FOR EIA SCOPING OPINION

ENERGY RECOVERY FACILITY AND TRANSFER STATION

FORD CIRCULAR TECHNOLOGY PARK, FORD AIRFIELD INDUSTRIAL ESTATE, FORD, ARUNDEL, BN18 0HY

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 Ford Circular Technology Park, Ford Road, Ford.

As part of WSCC's consultation on the Scoping Report, we have prepared this response on behalf of Redrow Homes Southern Counties and Wates Developments Ltd in connection with their interest in land adjoining the site.

Background

Redrow and Wates have an interest in land at Ford Airfield that 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).

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. These allocations clearly establish the 'in principle' acceptability of residential-led mixed-use development at the site.

Technical work and engagement with the local community, local planning authority, local highway / education / waste authorities and other key consultees has been ongoing as part of the promotion



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of the site through the Local and Neighbourhood Plans for a number of years.

A public exhibition was recently held in January 2020 ahead of submission of an Outline planning application, which is due to take place shortly.

Comments

We are aware of the basis for which consultation is taking place on the Scoping Report. In summary, as explained in your notification letter, responses have been sought in relation to the following:

"Under the Regulations, I am obliged to consult with the likely consultation bodies regarding the matters which should be considered in the Environmental Statement. I would therefore be grateful for your comments as to whether the scope of assessment set out in the Scoping Request is sufficient and appropriate – whether there are any particular issues or matters that you feel should also be considered in any forthcoming EIA, and whether the methodology outlined appropriate.

Please note, it is not necessary to comment on the merits of the proposal at this stage, which will be considered when/if a formal planning application is submitted. As with any planning application, the requirements of the National and Local Validation List will also apply."

Overall, we wish to ensure that appropriate regard is given to land at Ford Airfield adjacent to the application site, in recognition of its allocation for a residential-led mixed-use development. While we recognise that the application site is identified in the West Sussex Waste Local Plan (April 2014) as a Strategic Waste Allocation, it is necessary to ensure compatibility between each allocation, including the respective aspirations of each Authority. With this in mind, based on the information provided in the Scoping Report, at present, the extent to which this can be achieved is not clear, given the potential implications on the Masterplan for Ford Airfield.

In summary, given the significant scale of development proposed at the application site, particularly its extent and operations – alongside associated impacts, particularly noise, odour and landscape / visual – it is necessary to carefully consider the relationship of the proposals to the masterplan for Ford Airfield. The proposals are significantly in excess of current operations at Grundon as well as those permitted in January 2015 (ref. WSCC/096/13/F). It is important to note that the allocations made in the Local and Neighbourhood Plan were made in full knowledge and understanding of the existing waste allocation – with WSCC and Grundon / Viridor consulted as part of the plan-making process – and it is essential that any development now proposed pays full regard to these allocations.

In light of the status of the allocation, it is critical that the Environmental Statement for Grundon / Viridor's proposals includes a robust assessment of the impacts of the scheme on the future receptors at Ford Airfield. The site represents a significant element of the future development of the area and is a core allocation within the Arun District Local Plan and Ford Neighbourhood Development Plan. As such, the impacts of any scheme which could materially affect this allocation need to be carefully considered to ensure appropriate mitigation can be delivered.

With the above in mind, we wish to ensure that your Scoping Opinion fully takes account of the potential impacts on the proposals on land allocated at Ford Airfield to ensure that any scheme is compatible and does not prejudice the creation of a successful place. This will ensure that any assessment work undertaken to inform any application on the existing Grundon site is comprehensive and appropriately responds to the allocation at Ford Airfield.

The remainder of these comments provide our response to specific elements of the submitted Scoping Report.

Paragraphs 1.1 and 3.2

Paragraph 1.1 explains that the site currently handles about 20-25,000 tonnes of waste per annum. In comparison, it is noted that the Environmental Statement in support of the 2015 permission confirms that the approved facility would handle up to 200,000 tonnes of waste per annum. However, it is not clear from the current Scoping Report how much waste the current proposals would handle as this information is not provided.

To assist, it is noted that the Environmental Statement in support of the 2015 permission explains that the scheme would generate 14MW of electricity, while paragraph 3.2 of the current Scoping Report explains that the current proposals will generate approximately 31MW of electricity. It can therefore be inferred that approximately double the amount of waste could be handled at the proposed facility compared to that currently permitted. With this in mind, we request that Grundon / Viridor provide full details of the quantum of waste they anticipate handling per annum at the proposed facility to enable full consideration of the potential impacts.

Paragraphs 3.3 and 10.8

Paragraph 3.3 explains that the proposed ERF is likely to be housed within a building approximately 47m high, with a single stack up to 80m high. In comparison, the approved elevations associated with the 2015 permission show that the maximum height of the buildings was 22m, with a 50m dual stack. The tallest elements of the proposed facility are therefore significantly taller (114% more for the building and 60% more for the stack) than the 2015 permission.

In addition to being considerably taller, it is necessary to consider the impact of the scale of the proposals (the buildings in particular), namely the combination of their height, alongside the width and length that they would extend across and their mass / bulk, but this information is not currently available. It is noted that paragraph 10.8 acknowledges this, stating that *"The scale of the proposed buildings and the height of the stack mean that these effects have the potential to be significant."* Consideration will therefore need to be given to ensuring that the height and scale of the buildings / stack is compatible with a neighbouring residential-led development, including any change in levels and the operations due to take place at different levels i.e. above screening.

Paragraphs 3.5 and 14.3

Paragraph 3.5 explains that parking for the ERF will be to the east of the ERF building, while parking for the WTS will be to the south of the WTS workshops and offices. Given the size of the two proposed buildings and the nature of the proposed operations, it is assumed that some parking would be required along the boundaries of the site.

Given the quantum of heavy goods vehicles (HGV) movements permitted at the site (120 HGVs entering and exiting the site Mondays to Fridays and 60 HGVs entering and exiting the site on Saturdays, as confirmed at paragraph 14.3), there is likely to be a high degree of noise associated with reversing (beeping) HGVs (potentially as late as 8pm Mondays to Fridays and 6pm on Saturdays, as confirmed by condition 3 of the recent access road permission ref. WSCC/027/18/F). It is therefore necessary to consider the location of parking bays and vehicular washing facilities within the site and potential implications on the Masterplan at Ford Airfield, alongside the nature and extent of noise mitigation measures that may be required.

Paragraph 5.10

It is welcomed that paragraph 5.10 confirms the following:

"The land surrounding the site is allocated for residential and employment use in the adopted Arun Local Plan 2011-2031 and it is possible that some of the new dwellings may be occupied before construction works on the proposed development are completed. The Institute of Air Quality Management (IAQM) recommends that an assessment is carried out if there are sensitive receptors within 350m of the site boundary, as such an assessment of the impact of

construction phase dust generating activities will be included in the air quality assessment."

While not yet a submitted planning application, it is necessary to have regard to what could come forward on adjacent land in the future, particularly where it has been allocated in an adopted Local and Neighbourhood Plan.

Based on the current Masterplan for Ford Airfield, we encourage WSCC to require an assessment of the impact of construction phase dust generating activities in the area shown in Appendix A of this letter. The 350m buffer outlined relates to the screening criteria in the Institute of Air Quality Management (IAQM) document 'Guidance on the assessment of dust from demolition and construction', which states that an assessment will be required if there is a 'human receptor' i.e. residential properties within 350m. It is also important to note that the guidance explains that human receptors within 50m of the routes used by construction vehicles should also be considered within the construction phase assessment.

Paragraph 5.12

Paragraph 5.12 explains that the nature of the proposed development means there is the potential for odours to arise from the site and that odour management will be an integrated part of the design of the scheme. It concludes that no significant odour nuisance is expected to occur.

Based on conversations with local residents during the January 2020 public exhibition we understand that they have experienced significant odour on an ongoing basis from the existing Grundon facility. We recommend that the Environmental Health Officer is contacted to confirm whether any formal complaints have been received. It is understood that this 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 in the process. This conflicts with the requirements set out within Grundon's permit as provided at Appendix B, 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."

Further to this, we understand that Grundon does not have an odour or environmental management plan.

Paragraph 5.16

Paragraph 5.16 explains that the findings of the scoping process in relation to air quality and climate effects are summarised in Table 5.2. This notes that the potential effect concerning 'generation of odour' will not be included in the Environmental Statement. In light of the points raised above, alongside odour being detected by ourselves during a site visit at Ford Airfield, we encourage WSCC to require that odour is considered as part of the Environmental Statement. To ensure that the proposed facility has an acceptable relationship with the Ford Airfield Masterplan, we recommend that odour is considered across the whole of the Ford Airfield site, utilising the IAQM guidance, which requires a robust assessment of odour impacts be undertaken in agreement with the Council's Environmental Health Officer. Any application will need to be supported by comprehensive baseline assessments for all relevant environmental considerations.

Paragraphs 10.4, 10.5 and 10.8

As explained earlier, the proposed ERF is likely to be housed within a building approximately 47m high, with a single stack up to 80m high. This would be far in excess of the heights of the buildings / structures associated with the 2015 permission, alongside comprising a far greater scale when considering the combined impact of their height, width, length and mass / bulk. The sheer scale of

the proposals should not be understated or underestimated. It is helpful that paragraph 10.8 confirms the following:

"The landscape character will change from a partially open and derelict site to a built-up, operational facility. This change also has the potential to affect surrounding landscape character areas from which the site is visible. The scale of the proposed buildings and the height of the stack mean that these effects have the potential to be significant."

With this in mind, the impact on the Masterplan for Ford Airfield – alongside the existing designations / receptors covered in paragraphs 10.4 and 10.5 – needs to be fully considered and assessed. An appropriate balance between securing a high-quality place that creates a healthy and sustainable living environment alongside an allocated waste site needs to be achieved, in liaison with the Local Planning Authority at Arun District Council. Given the obvious tensions between the two uses, extensive liaison and close attention needs to be given to ensure compatibility.

In particular, such a large-scale industrial building and associated stack will likely be overbearing for neighbouring dwellings and amenity space. These structures could inadvertently become a major landmark for the local area with people associating the Landings with an EfW site rather than a residential area. This could lead to the area ultimately having an overarching industrial as opposed to residential character, which needs to be fully assessed.

Paragraph 10.7

Paragraph 10.7 of the Scoping Report explains the following:

"The proposed development will change the character of the site from partially vacant, open hardstanding with some derelict buildings and limited operational buildings to a fully operational waste management site. However, as there are already structures on the site, the overall change in land cover will not be significant."

It is important to be realistic about the extent of land cover associated with the proposals. While there are some structures on site at present, their extent is relatively limited when compared to that associated with *"a fully operational waste management site."* This is best explained with reference to our comments above concerning paragraphs 1.1 and 3.2 of the Scoping Report. In summary, the proposed development would handle a far greater quantum of waste and generate a far greater quantum of electricity than the current operations, alongside the level of operations granted by the 2015 permission. As a consequence, the land requirements will undoubtedly increase by some distance.

Notwithstanding paragraph 3.1 of the Scoping Report, which confirms that all existing buildings on site will be demolished, the proposed structures will likely have a far greater coverage than the existing structures. It would be helpful for any planning application to confirm the coverage of existing buildings on site and how this compares to the coverage of buildings under the 2015 permission and the current proposals.

Paragraph 10.10

In light of our earlier comments, we suggest that the potential effect 'Change to land cover of the site', as referred to in Table 10.2, be included in the Environmental Statement.

Paragraph 10.12

It is recommended that the study area for the Landscape and Visual Assessment is a minimum of 5km from the site boundary to include the South Downs National Park and likely effects from the proposed development on landscape and visual receptors.

Paragraph 10.13

Paragraph 10.13 explains that representative viewpoints will be established and confirmed with WSCC's landscape officer. A number of representative viewpoints have been considered as part of the Environmental Statement for the forthcoming planning application at Ford Airfield, which were discussed and agreed with Arun District Council. With this in mind, alongside ensuring appropriate consideration is given to the Masterplan at Ford Airfield, we recommend that those viewpoints already identified and agreed with Arun District Council within the wider study area for the forthcoming planning application at Ford Airfield, alongside the close distance viewpoints provided at Appendix C, are considered as part of any application at the site.

Furthermore, as the scale of the proposed development may have significant effects on views from the South Downs National Park, particularly elevated locations where there are long distance views towards the coast, it is recommended that viewpoint locations are identified within the National Park, in consultation with the South Downs National Park Authority.

Paragraph 13.4

Regarding noise, it is helpful that paragraph 13.4 acknowledges that *"there is the possibility that new dwellings may be constructed and occupied in the surrounding allocated area before construction of the proposed development is completed."* It is welcomed that noise mitigation measures will be implemented through a Construction Method Statement that can be conditioned as part of any planning permission. It will be necessary to ensure strict compliance with the requirements of such a Statement to avoid adversely impacting upon new residents.

Paragraph 13.7

Paragraph 13.7 explains that the operation of the proposed plant and day-to-day activities on site will generate noise post-construction. It goes on to explain that the operations will be enclosed and the buildings will be designed to reduce plant noise to within acceptable levels at the nearest sensitive receptors, while with appropriate mitigation, plant noise would not pose unacceptable noise impacts. Furthermore, it states that *if* (our emphasis) the plant rating noise level limit is achieved, operational noise is not considered to be significant. We note that operational noise should include noise emissions from all sources associated with the facility, including HGV movements and other day-to-day activities i.e. not just the proposed plant.

We note that the control of noise emissions at the existing Grundon site are currently subject to planning conditions, including limits on the hours of use for intensive operations. The proposals represent an intensification of the existing and more recently consented operations and so there is the potential for increased operational noise. It is also relevant to note that the achievement of acceptable noise limits is reliant on the plant rating noise level being achieved. Given the proximity of the allocation at Ford Airfield to the site, it is critical that sufficient mitigation is secured to ensure an appropriate relationship, especially as the Scoping Report explains that the facility will operate 24 hours a day. In addition, strict monitoring of compliance by WSCC is necessary, especially as we are aware from conversations with local residents during our recent public exhibition of concerns regarding noise from the existing facility.

It is necessary to have regard to the requirements set out within Grundon's permit as provided at Appendix B, which explains at paragraph 3.3.1 that:

"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."

Paragraph 13.8

Paragraph 13.8 explains the following:

"While new dwellings may be constructed and occupied in the surrounding allocated area before construction of the proposed development is completed, these are not likely to be close enough to be affected by significant vibration from piling."

It would be helpful to confirm what distance it has been assumed that the new dwellings at Ford Airfield would be from the proposed facility. It will need to be ensured that no future residents will be adversely affected by noise and vibration from piling operations. Appropriate mitigation should be secured by condition.

Paragraph 13.11

Paragraph 13.11 explains that it is proposed that noise and vibration are not scoped into the EIA and will not be considered in the Environmental Statement. In light of the above, it is essential that noise and vibration are scoped into the Environmental Statement, as was the case for the Environmental Statement that supported the 2015 permission. It seems odd that the topic would not be scoped in when it was previously scoped in for a far smaller scheme.

Furthermore, if a noise assessment is to be submitted as part of any planning application as suggested in paragraph 13.11, which we would encourage, we would expect this to assess the impacts of construction noise, vibration and operational noise levels on the proposed new dwellings within the Ford Airfield Masterplan, with mitigation measures specified accordingly. With this in mind, and as it is difficult to confirm specific receptor locations at this stage, as the proposed 80m high stack has the potential to affect a lot of dwellings, we recommend that noise impact is assessed across the whole of the Ford Airfield site.

Paragraph 14.8

While the Scoping Report explains that the proposed level of operational traffic would remain the same as that already consented, no consideration appears to have been given to the additional construction traffic that would be required to construct a much larger facility. The impact of this activity would be exacerbated by the fact that the 2015 permission comprised two points of access. The subsequent reduction to a single point of access means that all construction activity will be concentrated through a single location. While this may not have been something that required consideration as part of the original application, the subsequent allocation of sites in Ford and Climping as part of the adopted Local Plan alters the sensitivity of local receptors, as does the recent introduction of the off-carriageway NCN Route 2 alongside the A259.

Paragraph 3.20 of the Institute of Environmental Management and Assessment (IEMA) cites that a sensitive receptor includes links or locations where there may be high pedestrian flows. In this instance, allocations for residential development and the construction of new schools in the locality will inevitably increase foot and cycle flows on Ford Road, upon which the proposed development will route 100% of its HGV and construction traffic along. It would therefore be appropriate for consideration to be given to the impact upon 'Community Severance' and 'Fear and Intimidation of Road Users and Pedestrians', in accordance with the IEMA Guidelines, to establish whether improvement is required to address the likely significant impact of the HGV traffic associated with the proposed facility.

Paragraph 14.9

The Transport Evidence base associated with the Arun Local Plan identified a 'severe' highway safety issue at the A259 / Yapton Road (Oystercatcher) and the A259 / Bilsham Road (Comer Corner) junctions; a scheme to mitigate the severe highway safety issue is yet to be identified. Whilst routing of HGV traffic to the east of the site from the Church Lane / A259 junction will limit the HGV movements through these junctions, the proposals will inevitably increase the traffic flows

through an increase in staff trips, particularly if the amount of waste to be handled could increase by in excess of 10 times existing levels. It would be appropriate for any application to consider the impact of this additional traffic upon the operation of the junctions and identify suitable measures to mitigate the highway safety concerns.

Paragraph 17.3

Paragraph 17.3 sets out that – at this stage – it is envisaged that three consented developments will be included in the cumulative effects assessment of the Environmental Statement. This is a very limited number of schemes and we question whether further schemes should be included given the level of development activity in the local area, potentially other strategic allocations aside from those solely at Ford, Climping and Yapton.

Paragraph 17.4

Paragraph 17.4 explains that – although a planning application is yet to be submitted for the Masterplan at Ford Airfield – an EIA Scoping Opinion has been sought and it is possible that a planning application could be submitted and approved before the Ford ERF and WTS application is determined. It goes on to state that given this, and the proximity of the allocation to the application site, it is considered appropriate for the scheme to also be included within the cumulative effects assessment. We agree with the suggested approach.

We also wish to confirm that a planning application concerning Ford Airfield will be submitted in due course, which underlines the need to consider the impact of Grundon / Viridor's proposals on future receptors. For ease of reference, the material from the January 2020 public exhibition, which was based on the draft application documents, can be accessed here: https://fordwestsussex-pc.gov.uk/media/8886/23885-exhib-january-2020-a03_lowres.pdf

Paragraphs 18.1 and 18.3

Paragraph 18.1 sets out the topics where it is considered the potential effects of the proposals are likely to be significant. Based on this, paragraph 18.3 details the topics that are proposed for inclusion in the Environmental Statement.

This includes the following:

- Air quality and climate
- Community, social and economic effects
- Cultural heritage
- Landscape and visual effects

On this basis, Grundon / Viridor propose that the following topics are scoped out of the Environmental Statement:

- Ground conditions
- Land use and land take
- Major accidents / disasters
- Natural heritage
- Noise and vibration
- Traffic and transport
- Waste and natural resources
- Water environment

It is clear that a narrow Environmental Statement is proposed. For the reasons explained earlier, we encourage WSCC to request that consideration of the following additional topics / potential effects are included in the Environmental Statement, as a minimum:

- Noise and vibration
- 'Generation of odour' within the air quality and climate chapter
- 'Change to land cover of the site' within the landscape and visual effects chapter

Conclusion

Overall, as explained throughout these comments, it is necessary to ensure that appropriate regard is given to the allocation of land at Ford Airfield adjacent to the application site, in recognition of its allocation for a residential-led mixed-use development.

It is necessary to ensure compatibility between the allocation of our client's land alongside the allocation of the application site as a Strategic Waste Allocation. Based on Grundon / Viridor's current proposals, at present, the extent to which this can be achieved is not clear.

With this in mind, we wish to ensure that your Scoping Opinion fully takes account of the potential impacts on the proposals on land allocated at Ford Airfield – particularly in relation to air quality / odour, noise and landscape / visual impacts – to ensure that any scheme is compatible and does not prejudice the creation of a successful place in line with the aspirations of Arun District Council, Ford Parish Council and their respective communities.

We trust this submission is clear and helpful. Should you have any queries or wish to discuss these matters further then please do contact me.

I would be grateful if you could notify me when your Scoping Opinion has been formally published via email at Robin.Shepherd@bartonwillmore.co.uk.

Yours sincerely,



ROBIN SHEPHERD

Senior Planning Partner

cc Karl Roberts, Arun District Council
Neil Crowther, Arun District Council