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Chris Bartlett
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[by email]

06 August 2020

Dear Mr Bartlett,

Planning Application for: Development of an Energy Recovery Facility at Ford Circular Technology Park, Ford Road, Ford, Arundel BN18 0XL

Thank you for consulting Public Health England (PHE) on this planning application on 8 July 2020.

Background

The applicant is proposing to develop a purpose-built energy recovery facility (ERF) and a waste sorting and transfer facility (WSTF). The ERF facility would generate electricity by way of a steam turbine which would be driven through the combustion of up to 275,000 tonnes per annum (tpa) of non-hazardous, non-recyclable residual municipal solid waste and commercial and industrial waste. The neighbouring WSTF would accept and process approx. 20,000 tonnes of non-hazardous waste: recyclable materials will be sorted and transferred off-site and residual non-recyclable material will be transferred to the ERF (estimated to be approx. one third of waste). The proposals state waste would be sourced primarily from West Sussex, but also from East Sussex, Hampshire, Surrey, and potentially other areas. There will also be a number of other buildings and structures ancillary to the ERF and WSTF (e.g. gatehouse, weighbridges, electricity transformer, storage tanks (diesel, fire water), parking etc); and landscaping planting.

The location of the proposed development is to the west of the village of Ford. Yapton is situated approx 1km west; Climping approx. 1km south; Littlehampton 3km to the east and Arundel 4km to the northeast.

The area surrounding the site is a mixture of agricultural, industrial/commercial and residential. The nearest residential areas are 220m northeast (on Ford Lane); 375m southwest (on the edge of Yapton); 400m east (Rodney Crescent) and 500m north northeast (Ford Lane).

Regulatory context

Operators of waste incinerators are required to monitor emissions to ensure that they comply with the emission limits stated in the EU Industrial Emissions Directive 2010/75/EU(IED)**.** This Directive has been implemented in England and Wales by the Environmental Permitting (England and Wales) (Amendment) Regulations 2016[1] ('EP' Regulations), which is regulated by the Environment Agency

[1] https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-incineration-directive/environmental-permitting-guidance-waste-incineration

(EA) and includes Emission Limit Values (ELVs) for a range of pollutants and requires monitoring to ensure compliance during operation.

Under the EP Regulations, the operator is required to apply for an Environmental Permit (EP). The EP will set out operating requirements which must be complied with to protect the environment and public health. The EP application will have to demonstrate that the proposed plant will use Best Available Techniques (BAT) in order to control emissions to air, land and water.

The EA consults organisations including PHE; the local planning and waste authorities (LA) and the Food Standards Agency (FSA) on EP applications. PHE assesses the potential public health impact of a proposed installation and makes recommendations based on a critical review of the information provided for the EP application. PHE will request further information at the environmental permitting stage if it believes that this is necessary to be able to fully assess the likely public health impacts. This is separate to this planning consultation response.

Air Quality
The demolition/construction activities associated with the development have the potential to generate fugitive emissions of dust/particulate matter and vehicle emissions. The applicant considers that due to the short-term nature of the construction phase and with mitigation measures in place the potential for impact on local air quality will not be significant. It is noted that the consultation includes a draft construction environmental management plan (CEMP) outlining a range of mitigation measures. Due to the potential for dust/particulate matter to lead to amenity concerns, particularly if nearby proposed developments introduce receptors closer to the site than currently before construction on this project commences, we would expect that the mitigation measures within the CEMP are sufficient to minimise impact on the nearest receptor and that the CEMP is agreed with the Environmental Health department at Arun District Council.

During the operational phase of the development, there will be point source emissions of products of combustion from the ERF stack and the potential for fugitive emissions of dust/ particulate matter from the receipt, storage and handling of waste at the ERF and WSTF. The applicant proposes abatement technologies to reduce combustion emissions such that ELVs will be achieved. As detailed above the operational aspects will be required to have an EP which will put conditions in place on the emissions to air. PHE will provide detailed comments on the potential public health hazards of the operational phase of proposed facility to the EA, as part of the requirements of the EP regime.

PHE has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health (https://www.gov.uk/government/publications/municipal-waste-incinerators-emissions-impact-on-health). PHE's risk assessment is that modern, well run and regulated municipal waste incinerators are not a significant risk to public health. While it is not possible to rule out adverse health effects from these incinerators completely, any potential effect for people living close by is likely to be very small. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that these incinerators make only a very small contribution to local concentrations of air pollutants.

Nuisance aspects
During the operational phase of the ERF and WSTF, there is the potential for odour, noise, and pests/vermin due to the nature of the wastes that will be received, stored and handled on site. The applicant notes that design and operational control, plus additional mitigation measures will be place, to minimise off-site impacts. As detailed above the operational aspects will be required to have an EP which will put conditions in place on emissions to air. PHE will provide detailed comments on the potential public health hazards of the operational phase of proposed facility to the EA, as part of the requirements of the EP regime.

Based solely on the information contained in the application provided, PHE has no significant concerns regarding risk to health of the local population from potential emissions associated with

the proposed activity, providing that the applicant takes all appropriate measures to prevent or control pollution, in accordance with relevant technical guidance or industry best practice.

PHE would like to suggest that:

- The planning authority consult the local authority environmental health department for matters relating to noise, odour, dust and other nuisance emissions
- The planning authority also consult the Director of Public Health for matters relating to wider public health impacts

Any additional information obtained by the planning authority in relation to these comments should be sent to PHE for consideration. Such information could affect the comments made in this response.

Yours sincerely

Environmental Public Health Scientist

Cc Public Health England South East, Health Protection Team