

Comment for planning application WSCC/036/20

Application number	WSCC/036/20
Name	C. ROSS
Address	46 Southdean Drive, Middleton on Sea, West Sussex. PO22 7TB
Type of Comment	Objection
Comments	<p>Significant Areas of Concern for the Ford EFW facility</p> <p>Visibility The buildings are up to 50 metres in height. These will be very visible from a long distance. It will impact views from Arundel, the South Downs national park, Littlehampton and the coast. This is an unacceptable level of harm. It could only be mitigated by a significant redesign with much lower buildings.</p> <p>Noise Levels The noise levels will be unacceptably high at night for the local residents and the residents of the proposed new housing in the area. The environmental statement 'Technical appendix J: Noise and Vibration Assessment' sets out the assessment made by the applicant on the potential noise impact. There appear to be a number of serious shortcomings in this report which result in the assessment not identifying the likely true impact for local residents and the future residents of the proposed new housing area. For example, the receptor locations selected appear to be given equal weight in the assessment and yet some are likely to represent only a few people affected. There are also significant areas of residential dwellings that are not represented by any receptor at all (e.g. to the West of the site) Many of the receptor locations have been chosen at locations close to roads where the background noise is due to traffic. These bias the results by increasing the level of the background noise resulting in an apparently low impact from the site operational noise. It is unclear from the report how the background noise levels were assessed at the receptor locations. In section 6.1.15, it is stated: "Background noise levels have been determined using the noise prediction model that is calibrated to road traffic noise sources". There is no information on the prediction model used nor why it should be assumed that road traffic noise will dominate except for the fact that many of the monitoring points were chosen to be on roads where traffic noise is high. Very surprisingly, the location for LT3 was adjacent to a drain cover in need of maintenance that made high noise levels as vehicles drove over it! This certainly biased the results. Without clarity on the veracity of the background noise levels, and with a selection of relatively unrepresentative locations, the baseline cannot be relied upon. Moreover, the noise from the stack has been assessed by simple radial spreading without taking into account any ground reflection. There is no information on the background noise spectrum and the operational noise spectrum. It is likely that these will differ significantly. The stack noise may well have a tonal content due to the fans. If this is the case, and the spectra differ, then an additional 5dB should be added to the perceived impact - resulting in a much more significant noise disturbance. In conclusion, the environmental statement cannot be relied upon and we should assume that there will be a significant rise in night-time noise levels for many of the local residents.</p> <p>Harmful Emissions There will be emissions from the stack that are likely to be judged to be harmful. There should be a requirement to update the technology for the cleaning of the flue gasses every 5 years to the latest technology available in order to minimise pollution which would otherwise impact the health of local residents. The current standards were set before the outbreak of COVID-19 and we are learning that higher levels of NOx exposure can make people more vulnerable. As we continue to learn more about the impact of pollution and the technology for controlling it, we need to ensure that any EFW facility continues to be acceptable. It is intolerable to build something now that will be in operation for more than 20 years and find in the future that it is a major problem that we cannot control. The technology currently proposed by the applicant for the proposed Ford Energy Recovery Facility (ERF) is selective non-catalytic reduction (SNCR) for flue gas cleaning. This technology will inject urea into the combustion chamber to abate nitrogen oxide. This is a well-established technology that has been in use for more than 10 years and it meets the current (pre-covid) standards. However, there is a much better technology SCR (selective catalytic reduction) available: SCR involves the injection of ammonia into the flue gas in the presence of a catalyst to reduce NOx to nitrogen and water. It involves the installation of an SCR reactor (i.e., catalyst) at some point downstream in the process. SCR is typically much more efficient at reducing NOx emissions and is available now. We should not let the applicant use old-fashioned technology to harm lives.</p>
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Attachments	