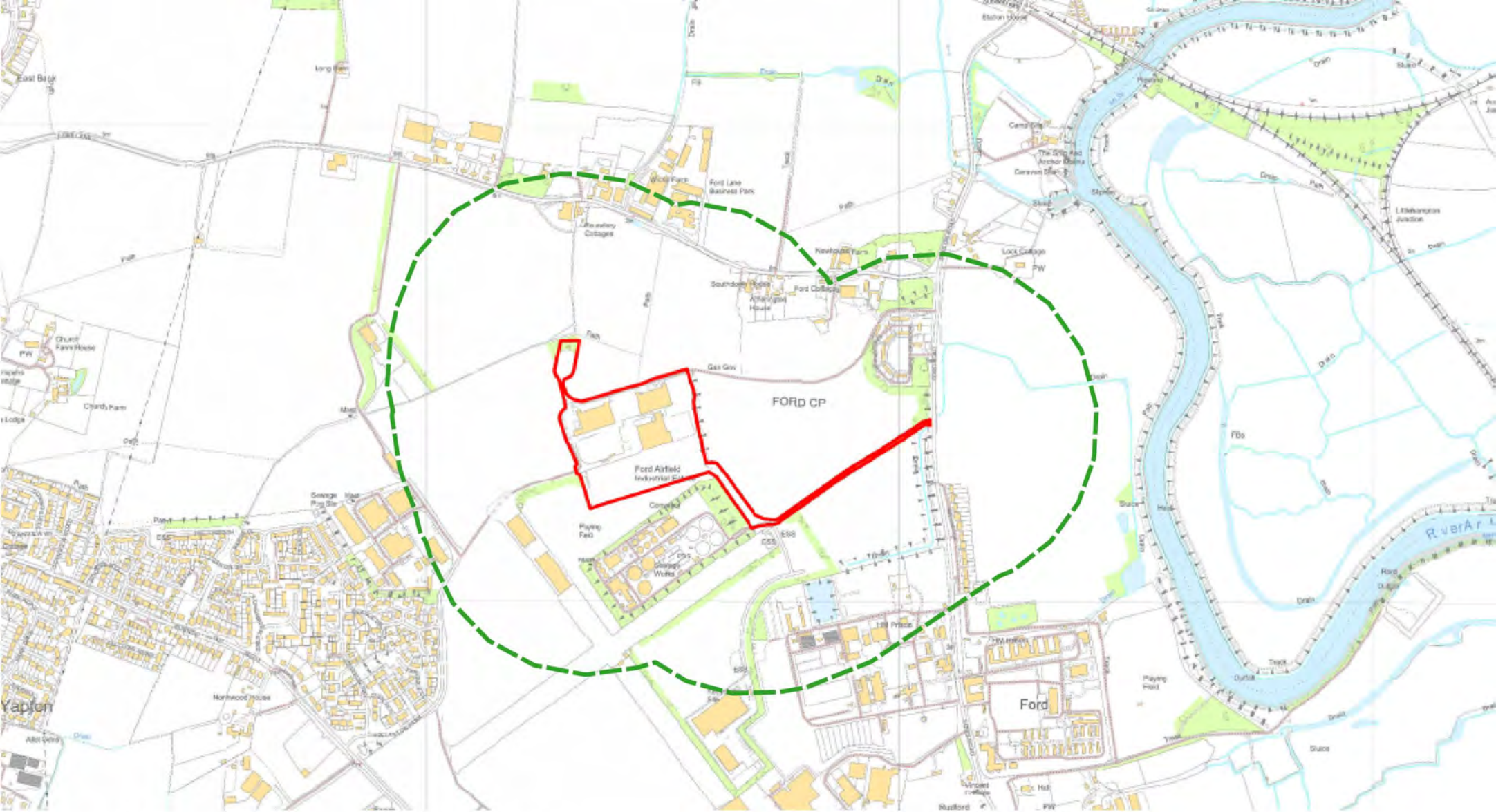
APPENDIX A

RECOMMENDED 350M CONSTRUCTION DUST BUFFER


FORD CP
Ford Airfield
Ford
Yapton
0
250
500
750
1000 m
N
Legend
350m Construction Dust Buffer
Proposed Energy from Waste Site Boundary

APPENDIX B

GRUNDON PERMIT

LIT 6956 SR2008 NO3 _75KTE - HOUSEHOLD COMMERCIAL AND INDUSTRIAL WASTE TRANSFER STATION WITH TREATMENTStandard rules

Chapter 4, The Environmental Permitting (England and Wales) Regulations 2010

Standard rules SR2008 No3 75kte - household, commercial and industrial waste transfer station with treatment – existing permits

Introductory note

This introductory note does not form part of these standard rules.

These standard rules are only available for existing SR2008No3 permit-holders. New applicants should use standard rules SR2015 No6.

When referred to in an environmental permit, these rules will allow the operator to operate a Household, Commercial and Industrial Waste Transfer Station with waste treatment at a specified location, provided that the permitted activities are not carried out within 500 metres of a European Site[1], Ramsar site or a Site of Special Scientific Interest (SSSI); or within 50m of any well, spring or borehole used for the supply of water for human consumption. This must include private water supplies. Furthermore, specified waste cannot be treated outside a building within a specified Air Quality Management Area (AQMA)[2].

Permitted wastes are limited to non-hazardous wastes and do not include hazardous wastes such as asbestos. The total quantity of waste that can be accepted at a site under these rules must be less than 75,000 tonnes a year. With the exception of specified waste, all bulking, transfer or treatment of non-hazardous waste must be carried out inside a building. Wastes can be bulked up for disposal or recovery elsewhere and can also be treated by sorting, separation, screening, baling, shredding, crushing and compaction. These rules will not permit the burning of any wastes, either in the open, inside buildings or in any form of incinerator.

These rules do not allow any point source emission into surface waters or groundwater. However, under the emissions of substances not controlled by emission limits rule:

- Liquids may be discharged into a sewer subject to a consent issued by the local water company.
- Liquids may be taken off-site in a tanker for disposal or recovery.
- Clean surface water from roofs, or from areas of the site that are not being used in connection with storing and treating waste, may be discharged directly to surface waters, or to groundwater by seepage through the soil via a soakaway.

This permit allows waste recovery activities. Please note that any processed materials will continue to be regulated as waste until they meet the end of waste test in accordance with Article 6 of Directive 2008/98/EC. You can demonstrate that you have met the end of waste tests by either:

- meeting all the criteria set out in any relevant and applicable EU End of Waste regulations; or
- a case by case assessment taking into account the applicable case law, which includes meeting all the requirements of a relevant and applicable Quality Protocol or Defined Industry Code of Practice (e.g. CL:AIRE Development Industry CoP).

End of Introductory Note

[1] A candidate or Special Area of Conservation (cSAC or SAC) and proposed or Special Protection Area (pSPA or SPA) in England and Wales.

[2] An Air Quality Management Area which has been designated due to concerns about particulate matter in the form of PM_{10}.

Rules

1 – Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and

(b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with rule 1.1.1 shall be maintained.

1.1.3 Any persons having duties that are or may be affected by the matters set out in these standard rules shall have convenient access to a copy of them kept at or near the place where those duties are carried out.

1.1.4 The operator shall comply with the requirements of an approved competence scheme.

2 – Operations

2.1 Permitted activities

2.1.1 The operator is only authorised to carry out the activities specified in table 2.1 below ("activities").

Table 2.1 activities	
Description of activities	**Limits of activities**
D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced) **R13**: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) **D14:** Repackaging prior to submission to any of the operations numbered D1 to 13 **D9**: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12 **R3**: Recycling/reclamation of organic substances which are not used as solvents **R4**: Recycling/reclamation of metals and metal compounds **R5**: Recycling/reclamation of other inorganic materials	Treatment consisting only of manual sorting, separation, screening, baling, shredding, crushing or compaction of waste into different components for disposal, (no more than 50 tonnes per day) or recovery. No more than a total of 50 tonnes of intact and shredded waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site.

2.2 Waste acceptance

2.2.1 Waste shall only be accepted if:

(a) it is of a type and quantity listed in table 2.2 below; and

(b) it conforms to the description in the documentation supplied by the producer and holder; and

(c) any excavated soil from known or suspected contaminated sites (established as a result of visual inspection or from knowledge of the origin of the waste) is accompanied by prior chemical analysis establishing the type and degree of contamination.

Table 2.2. Waste types and quantities	
Maximum Quantities The total quantity of waste accepted at the site shall be less than 75,000 tonnes a year.	
Exclusions Wastes having any of the following characteristics shall not be accepted: • Consisting solely or mainly of dusts, powders or loose fibres • Wastes that are in a form which is either sludge or liquid	
Waste Code	**Description**

Table 2.2. Waste types and quantities	
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 01	wastes from mineral excavation
01 01 01	wastes from mineral metalliferous excavation
01 01 02	wastes from mineral non-metalliferous excavation
01 03	wastes from physical and chemical processing of metalliferous minerals
01 03 06	tailings other than those mentioned in 01 03 04 and 01 03 05
01 03 09	red mud from alumina production other than the wastes mentioned in 01 03 07
01 04	wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
01 04 11	wastes from potash and rock salt processing other than those mentioned in 01 04 07
01 04 12	tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11
01 04 13	wastes from stone cutting and sawing other than those mentioned in 01 04 07
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 03	plant-tissue waste
02 01 04	waste plastics (except packaging)
02 01 07	wastes from forestry
02 01 10	waste metal
02 02	wastes from the preparation and processing of meat, fish and other foods of animal origin
02 02 03	materials unsuitable for consumption or processing
02 03	wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation
02 03 04	materials unsuitable for consumption or processing
02 04	wastes from sugar processing
02 04 01	soil from cleaning and washing beet
02 04 02	off-specification calcium carbonate
02 05	wastes from the dairy products industry
02 05 01	materials unsuitable for consumption or processing
02 06	wastes from the baking and confectionery industry
02 06 01	materials unsuitable for consumption or processing
02 06 02	wastes from preserving agents
02 07	wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)
02 07 01	wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	wastes from spirits distillation
02 07 04	materials unsuitable for consumption or processing
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04

03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
03 03 07	mechanically separated rejects from pulping of waste paper and cardboard
03 03 08	wastes from sorting of paper and cardboard destined for recycling
03 03 10	Fibre rejects, fibre-, filler- and coating-sludges from mechanical separation
04	WASTES FROM THE LEATHER, FUR AND TEXTILE INDUSTRIES
04 01	Wastes from the leather and fur industry
04 01 08	waste tanned leather (blue sheetings, shavings, cuttings, buffing dust) containing chromium
04 01 09	wastes from dressing and finishing
04 02	wastes from the textile industry
04 02 21	wastes from unprocessed textile fibres
04 02 22	wastes from processed textile fibres
06	WASTES FROM INORGANIC CHEMICAL PROCESSES
06 09	wastes from the MSFU of phosphorous chemicals and phosphorous chemical processes
06 09 02	phosphorous slag
06 09 04	calcium-based reaction wastes other than those mentioned in 06 09 03
06 11	wastes from the manufacture of inorganic pigments and opacificiers
06 11 01	calcium-based reaction wastes from titanium dioxide production
07	WASTES FROM ORGANIC CHEMICAL PROCESSES
07 02	wastes from the MFSU of plastics, synthetic rubber and man-made fibres
07 02 13	waste plastic
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	wastes from the photographic industry
09 01 07	photographic film and paper containing silver or silver compounds
09 01 08	photographic film and paper free of silver or silver compounds
09 01 10	single-use cameras without batteries
09 01 12	single-use cameras containing batteries other than those mentioned in 09 01 11
10	WASTES FROM THERMAL PROCESSES
10 01	wastes from power stations and other combustion plants (except 19)
10 01 01	bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
10 01 05	calcium-based reaction wastes from flue-gas desulphurisation in solid form
10 01 07	calcium-based reaction wastes from flue-gas desulphurisation in sludge form
10 01 15	bottom ash, slag and boiler dust from co-incineration other than those mentioned in 10 01 14
10 01 19	wastes from gas cleaning other than those mentioned in 10 01 05, 10 01 07 and 10 01 18
10 01 24	sands from fluidised beds
10 02	wastes from the iron and steel industry
10 02 01	wastes from the processing of slag
10 02 02	unprocessed slag
10 02 08	solid wastes from gas treatment other than those mentioned in 10 02 07
10 02 10	mill scales
10 02 14	filter cakes from gas treatment other than those mentioned in 10 02 13
10 02 15	other filter cakes
10 03	wastes from aluminium thermal metallurgy
10 03 02	anode scraps
10 03 05	waste alumina
10 03 16	skimmings other than those mentioned in 10 03 15
10 03 18	carbon-containing wastes from anode manufacture other than those mentioned in 10 03 17
10 03 24	solid wastes from gas treatment other than those mentioned in 10 03 23
10 03 26	filter cakes from gas treatment other than those mentioned in 10 03 25
10 03 28	wastes from cooling-water treatment other than those mentioned in 10 03 27
10 03 30	wastes from treatment of salt slags and black drosses other than those mentioned in 10 03 29

10 04	wastes from lead thermal metallurgy
10 04 10	wastes from cooling-water treatment other than those mentioned in 10 04 09
10 05	wastes from zinc thermal metallurgy
10 05 01	slags from primary and secondary production
10 05 09	wastes from cooling-water treatment other than those mentioned in 10 05 08
10 05 11	dross and skimmings other than those mentioned in 10 05 10
10 06	wastes from copper thermal metallurgy
10 06 01	slags from primary and secondary production
10 06 02	dross and skimmings from primary and secondary production
10 06 10	wastes from cooling-water treatment other than those mentioned in 10 06 09
10 07	wastes from silver, gold and platinum thermal metallurgy
10 07 01	slags from primary and secondary production
10 07 02	dross and skimmings from primary and secondary production
10 07 03	solid wastes from gas treatment
10 07 05	filter cakes from gas treatment
10 07 08	wastes from cooling-water treatment other than those mentioned in 10 07 07
10 08	wastes from other non-ferrous thermal metallurgy
10 08 09	other slags
10 08 11	dross and skimmings other than those mentioned in 10 08 10
10 08 13	carbon-containing wastes from anode manufacture other than those mentioned in 10 08 12
10 08 14	anode scrap
10 08 18	filter cakes from flue-gas treatment other than those mentioned in 10 08 17
10 08 20	wastes from cooling-water treatment other than those mentioned in 10 08 19
10 09	wastes from casting of ferrous pieces
10 09 03	furnace slag
10 09 06	casting cores and moulds which have not undergone pouring other than those mentioned in 10 09 05
10 09 08	casting cores and moulds which have undergone pouring other than those mentioned in 10 09 07
10 09 14	waste binders other than those mentioned in 10 09 13
10 09 16	waste crack-indicating agent other than those mentioned in 10 09 15
10 10	wastes from casting of non-ferrous pieces
10 10 03	furnace slag
10 10 06	casting cores and moulds which have not undergone pouring, other than those mentioned in 10 10 05
10 10 08	casting cores and moulds which have undergone pouring, other than those mentioned in 10 10 07
10 10 14	waste binders other than those mentioned in 10 10 13
10 10 16	waste crack-indicating agent other than those mentioned in 10 10 15
10 11	wastes from manufacture of glass and glass products
10 11 03	waste glass-based fibrous materials
10 11 10	waste preparation mixture before thermal processing, other than those mentioned in 10 11 09
10 11 12	waste glass other than those mentioned in 10 11 11
10 11 16	solid wastes from flue-gas treatment other than those mentioned in 10 11 15
10 11 18	filter cakes from flue-gas treatment other than those mentioned in 10 11 17
10 12	wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 01	waste preparation mixture before thermal processing
10 12 05	filter cakes from gas treatment
10 12 06	discarded moulds
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 10	solid wastes from gas treatment other than those mentioned in 10.12 09

10 12 12	wastes from glazing other than those mentioned in 10.12.11
10 13	wastes from manufacture of cement, lime and plaster and articles and products made from them
10 13 01	waste preparation mixture before thermal processing
10 13 04	wastes from calcination and hydration of lime
10 13 07	filter cakes from gas treatment
10 13 10	wastes from asbestos-cement manufacture other than those mentioned in 10 13 09
10 13 11	wastes from cement-based composite materials other than those mentioned in 10 13 09 and 10 13 10
10 13 13	solid wastes from gas treatment other than those mentioned in 10 13 12
10 13 14	waste concrete
11	WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO METALLURGY
11 01	wastes from chemical surface treatment and coating of metals and other materials (for example galvanic processes, zinc coating processes, pickling processes, etching, phosphating, alkaline degreasing, anodising)
11 01 10	filter cakes other than those mentioned in 11 01 09
11 01 14	degreasing wastes other than those mentioned in 11 01 13
11 02	wastes from non-ferrous hydrometallurgical processes
11 02 03	wastes from the production of anodes for aqueous electrolytical processes
11 02 06	wastes from copper hydrometallurgical processes other than those mentioned in 11 02 05
11 05	wastes from hot galvanising processes
11 05 01	hard zinc
11 05 02	zinc ash
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	ferrous metal filings and turnings
12 01 03	non-ferrous metal filings and turnings
12 01 05	plastics shavings and turnings
12 01 13	welding wastes
12 01 17	waste blasting material other than those mentioned in 12 01 16
12 01 21	spent grinding bodies and grinding materials other than those mentioned in 12 01 20
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging
15 02	absorbents, filter materials, wiping cloths and protective clothing
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 02	wastes from electrical and electronic equipment
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13

16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 03	off-specification batches and unused products
16 03 04	inorganic wastes other than those mentioned in 16 03 03
16 03 06	organic wastes other than those mentioned in 16 03 05
16 06	batteries and accumulators
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
16 11	waste linings and refractories
16 11 02	carbon-based linings and refractories from metallurgical processes others than those mentioned in 16 11 01
16 11 04	other linings and refractories from metallurgical processes other than those mentioned in 16 11 03
16 11 06	linings and refractories from non-metallurgical processes others than those mentioned in 16 11 05
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastic
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	iron and steel
17 04 06	Tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
17 06	insulation materials and asbestos-containing construction materials
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 08	gypsum-based construction material
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 01	wastes from incineration or pyrolysis of waste
19 01 02	ferrous materials removed from bottom ash
19 01 12	bottom ash and slag other than those mentioned in 19 01 11

19 01 18	pyrolysis wastes other than those mentioned in 19 01 17
19 01 19	sands from fluidised beds
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 03	premixed wastes composed only of non-hazardous wastes
19 02 10	combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 04	vitrified waste and wastes from vitrification
19 04 01	vitrified waste
19 05	wastes from aerobic treatment of solid wastes
19 05 01	non-composted fraction of municipal and similar wastes
19 05 02	non-composted fraction of animal and vegetable waste
19 05 03	off-specification compost
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber
19 12 05	Glass
19 12 07	wood other than that mentioned in 19 12 06
19 12 08	Textiles
19 12 09	minerals (for example sand, stones)
19 12 10	combustible waste (refuse derived fuel)
19 13	wastes from soil and groundwater remediation
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	Glass
20 01 08	biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	Textiles
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 01 41	wastes from chimney sweeping
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 02 02	soil and stones
20 03	other municipal wastes
20 03 01	mixed municipal waste
20 03 02	waste from markets
20 03 03	street-cleaning residues
20 03 07	bulky waste

2.3 Operating techniques

2.3.1 The activities shall be operated using the techniques and in the manner described in Table 2.3 below.

Table 2.3 Operating techniques

1. The Operator shall:

   (a) following any fire or if required by the Environment Agency, submit to the Environment Agency for approval within the period specified a fire prevention plan;
   (b) implement the approved fire prevention plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

The fire prevention plan shall as a minimum specify:

(i) the total amount of waste that will be stored on site at any one time and if more than one type of waste is to be stored at the site the total amount of each type of waste;
(ii) the maximum time each type of waste will be stored on site;
(iii) the method of storage of each type of waste;
(iv) the maximum volume of each waste pile in m3;
(v) the location within the site where each type of waste will be stored;
(vi) the maximum size of any waste pile stack stipulating the maximum height, width and depth;
(vii) the minimum separation (fire break) distance between waste piles or storage areas;
(viii) if fire walls are used in place of fire breaks, full details of the design and construction of such walls;
(ix) the steps put in place to prevent and minimise the risk of a fire or of it spreading within the site or from the site;
(x) the steps put in place to extinguish a fire if a fire starts;
(xi) the steps and procedures to be followed if a fire occurs on site, including how the impact or emissions from a fire that may affect people or the environment will be minimised and mitigated; and
(xii) the provisions made to enable safe access to the site for fire and rescue services, including how the impact on people or the environment of water used in fighting the fire will be managed and minimised.

2. Unless stored or treated outside as specified waste[3]:

   a) all bulking, transfer or treatment of waste shall be carried out inside a building;

   b) all waste shall be stored in a building or within a secure container.

   c) all waste shall be stored and treated on an impermeable surface with sealed drainage system.

3. Specified waste shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system.

2.4 The site

2.4.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit.

2.4.2 The activities shall not be carried out within 500 metres of a European Site or a SSSI.

2.4.3 The activities shall not be carried out within 50m of any well spring or borehole used for the supply of water for human consumption. This must include private water supplies.

[3] "specified waste" is defined in section 4.4 of these standard rules.

2.4.4 No treatment of specified waste, unless undertaken in a building, shall take place within a specified AQMA.

2.5 Technical Requirements

Waste battery and accumulator treatment

2.5.1 Treatment of waste batteries and accumulators must meet the minimum requirements set out in Annex III, Part A of Directive 2006/66/EC of the European Parliament and of the Council on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC.

3 – Emissions and monitoring

3.1 Emissions of substances not controlled by emission limits

3.1.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.1.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan;

(b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.1.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.2 Odour

3.2.1 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.

3.2.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan;

(b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.3 Noise and vibration

3.3.1 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.

3.3.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan;

(b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 – Information

4.1 Records

4.1.1 All records required to be made by these standard rules shall:

(a) be legible;

(b) be made as soon as reasonably practicable;

(c) if amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval; and

(d) be retained, unless otherwise agreed by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:

(i) off-site environmental effects; and

(ii) matters which affect the condition of land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by these standard rules, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by these standard rules to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 Within one month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

4.3.1 The Environment Agency shall be notified without delay following the detection of:

(a) any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;

(b) the breach of a limit specified in these standard rules; or

(c) any significant adverse environmental effects.

4.3.2 Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours.

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by Stock Exchange rules:

a) Where the operator is a registered company:
- any change in the operator's trading name, registered name or registered office address; and
- any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

b) Where the operator is a corporate body other than a registered company:
- any change in the operator's name or address; and
- any steps taken with a view to the dissolution of the operator.

c) In any other case:
- the death of any of the named operators (where the operator consists of more than one named individual);
- any change in the operator's name(s) or address(es); and
- any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case them being in a partnership, dissolving the partnership.

4.4 Interpretation

4.4.1 In these standard rules the expressions listed below shall have the meaning given.

4.4.2 In these standard rules references to reports and notifications mean written reports and notifications, except when reference is being made to notification being made "without delay", in which case it may be provided by telephone.

"accident" means an accident that may result in pollution.

"Annex IIA" means Annex IIA to Directive 2006/12/EC of the European Parliament and of the Council of 5 April 2006 on Waste.

"authorised officer" means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in Section 108(4) of that Act.

"building" means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

"D" means a disposal operation provided for in Annex IIA to Directive 2006/12/EC of the European Parliament and of the Council of 5 April 2006 on Waste.

"emissions of substances not controlled by emission limits" means emissions of substances to air, water or land from the activities, either from emission points specified in these standard rules or from other localised or diffuse sources, which are not controlled by an emission limit.

"European Site" means Special Area of Conservation or candidate Special Area of Conservation or Special Protection Area or proposed Special Protection Area in England and Wales, within the meaning of Council Directives 79/409/EEC on the conservation of wild birds and 92/43/EEC on the conservation of natural

habitats and of wild flora and fauna and the Conservation (Natural Habitats &c) Regulations 1994. Internationally designated Ramsar sites are dealt with in the same way as European sites as a matter of government policy and for the purpose of these rules will be considered as a European Site.

"groundwater" means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

"impermeable surface" means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface, and should be read in conjunction with the term "sealed drainage system" (below).

"pollution" means emissions as a result of human activity which may—

(a) be harmful to human health or the quality of the environment,

(b) cause offence to a human sense,

(c) result in damage to material property, or

(d) impair or interfere with amenities and other legitimate uses of the environment.

"quarter" means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

"R" means a recovery operation provided for in Annex IIB to Directive 2006/12/EC of the European Parliament and of the Council of 5 April 2006 on Waste.

"sealed drainage system" in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

(a) no liquid will run off the surface otherwise than via the system;

(b) except where they may lawfully be discharged to foul sewer, all liquids entering the system are collected in a sealed sump.

"specified AQMA" means an air quality management area within the meaning of the Environment Act 1995 which has been designated due to concerns about particulate matter in the form of PM_{10}.

"specified waste" means the following waste codes in Table 2.2: 01 01 01, 01 01 02, 01 04 08, 01 04 09, 01 04 13, 02 04 01, 10 11 12, 10 12 08, 10 13 14, 15 01 07, 17 01 01, 17 01 02, 17 01 03, 17 01 07, 17 02 02, 17 03 02, 17 05 04, 17 05 08, 19 12 05, 19 12 09 and 20 02 02.

"SSSI" means Site of Special Scientific Interest within the meaning of the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000).

"Waste code" means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk. 'List of Wastes' means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste, as amended from time to time.

"year" means calendar year commencing on 1st January.

When the following terms appear in the waste code list in table 2.2 for that table they have the meaning given below:

'hazardous substance' means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008

'heavy metal' means any compound of antimony, arsenic, cadmium, chromium (VI), copper, lead, mercury, nickel, selenium, tellurium, thallium and tin, as well as these materials in metallic form, as far as these are classified as hazardous substances

'PCBs' means

- polychlorinated biphenyls
- polychlorinated terphenyls
- monomethyl-tetrachlorodiphenyl methane, Monomethyl-dichloro-diphenyl methane, Monomethyldibromo-diphenyl methane
- any mixture containing any of the above mentioned substances in a total of more than 0,005 %by weight

‘transition metals’ means any of the following metals: any compound of scandium, vanadium, manganese, cobalt, copper, yttrium, niobium, hafnium, tungsten, titanium, chromium, iron, nickel, zinc, zirconium, molybdenum and tantalum, as well as these materials in metallic form, as far as these are classified as hazardous substances.

‘stabilisation’ means processes which change the hazardousness of the constituents in the waste and transform hazardous waste into non-hazardous waste.

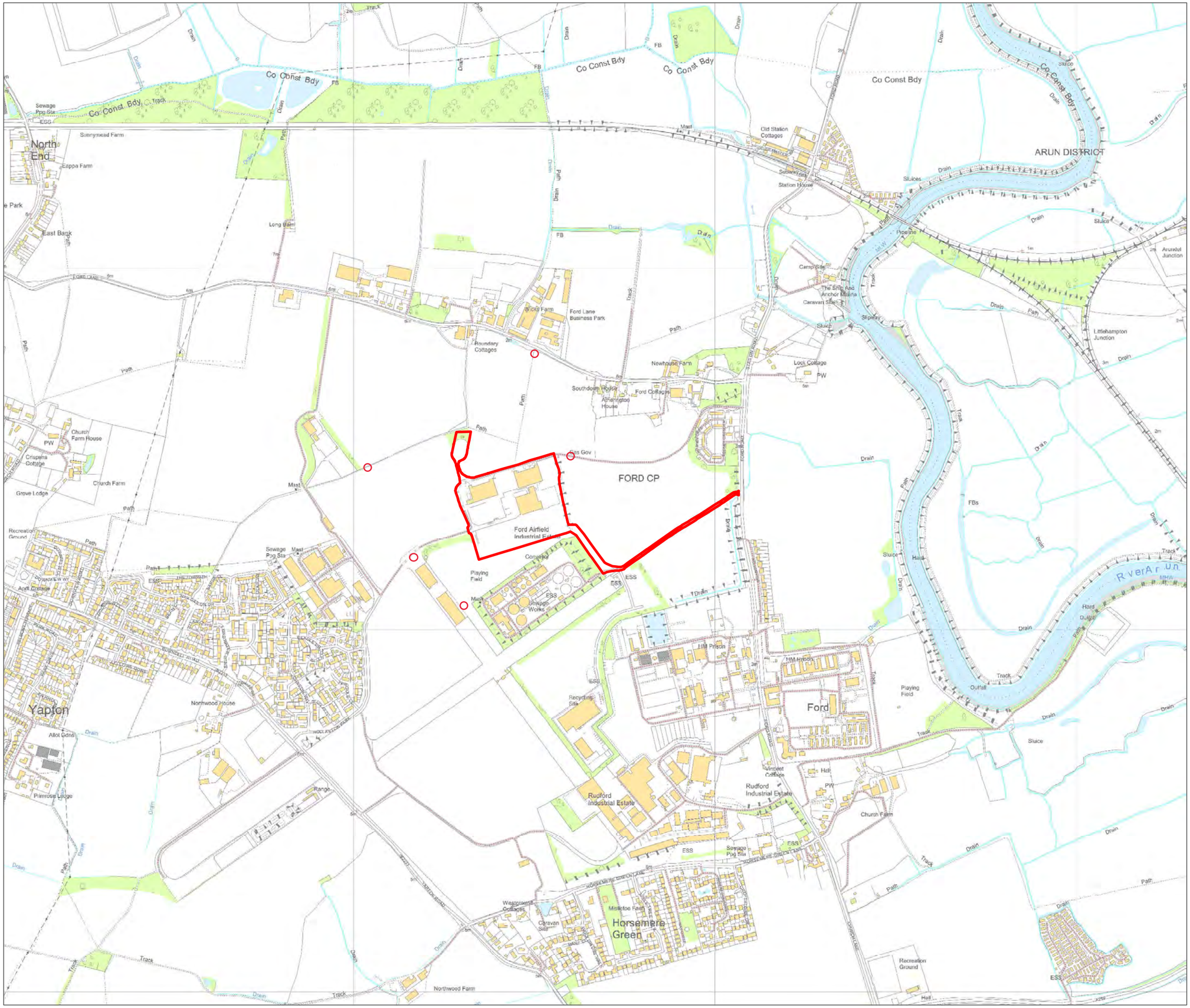
‘solidification’ means processes which only change the physical state of the waste by using additives without changing the chemical properties of the waste.

‘partly stabilised wastes’ means wastes containing, after the stabilisation process, hazardous constituents which have not been changed completely into non-hazardous constituents and could be released into the environment in the short, middle or long term.

End of standard rules

APPENDIX C

RECOMMENDED CLOSE DISTANCE VIEWPOINTS



Ford ERF and TS, Ford CTP

0 250 m

N

Figure 1: Site location plan

Dwg no/264101/E03	Revision
Status	08 January 2020
Scale: 1:10,000 @A3	Drawn by: JC / Checked by: ER

TERENCE O'ROURKE

LONDON
7 Heddon Street
London W1B 4BD

BIRMINGHAM
Enterprise House 115 Edmund Street
Birmingham B3 2HJ

BOURNEMOUTH
Everdene House Deansleigh Road
Bournemouth BH7 7DU

TELEPHONE
020 3664 6755

www.torltd.co.uk

County Development
Planning Department
County Hall West Street
Chichester
West Sussex
PO19 1RQ

Our ref: HA/2020/121984/01-L01
Your ref: Ford Circular Technology Park

Date: 14 February 2020

Dear Sir/Madam

Energy recovery facility and transfer station.

Ford Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY

Thank you for consulting the Environment Agency on the above application.

Environment Agency Position

We have reviewed the information provided and have the following comments to make.

The site rests upon River Terrace deposits, overlying Newhaven Chalk – classified as secondary A and principal aquifers respectively by the Environment Agency. The site does not sit within a source protection zone, however there are some small scale abstractions nearby. There are also inert legacy landfills proximal to the site.

The site has a legacy of industrial activity and there have been site investigations conducted in the past in support of previous planning applications. These investigations have revealed minimal contamination and indicates a low risk to groundwater.

Site Investigation:
Upon review of the EIA Scoping Report (ref 264101), the applicant indicates previous site investigations have revealed no evidence of demonstrable contamination which could cause a risk to groundwater. We would stress that some time has elapsed since these last intrusive investigations and that a minimum of an additional phase 1 investigation would be required. It is our understanding the applicant has already proposed this within the EIA, which we support.

We would expect the phase 1 investigation to be submitted for review by the Environment Agency and its format would comply with the current best practice;
BS 10175: Investigation of potentially contaminated sites – code of practice
BS 5930: Code of practice for ground investigations

If the phase 1 investigation reveals a hitherto unknown source of potential contamination, we would expect a strategy for investigating and quantifying said contamination to be included in the phase 1 report.

Land Contamination:
We note that within the EIA Scoping report, there is evidence to suggest soil based PAH contamination from a legacy fuel tank. The EIA scoping report indicates that there is no evidence of contamination on the concrete hard standing around the base of said tank, which was still in position at the time of the investigation. It was assumed that the tank was acting as the source. We would expect the phase 1 investigation to validate and confirm these assumptions.

We would also expect that any findings of the phase 1 investigation include a provision to deal with any unknown contamination at the site.

Controlled waters:
We expect the client to conduct a hydrological risk assessment based on the findings of the phase 1 investigation. This risk assessment is to include the potential impact from any penetrative works at the site. We can find no indication as to what type of foundations will be employed during the development phase.

Certain types of foundation construction can create preferential pathways for existing or new contaminants to reach groundwater and we would expect this to be addressed in any hydrological risk assessment.

Additionally, it is unclear at which time within the hydrologic calendar groundwater level data was obtained. Groundwater levels within this area fluctuate seasonally and we would expect this to be factored into any preliminary conceptual model generated by the phase 1 investigation.

Finally, it is our understanding that 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. The applicant will need to confirm that an increase in the intensity of operations at the site will not result in a risk to controlled waters via either/or increased run off and /or potential contamination of the run off. It is also our understanding that the applicant, has indicated that any foul sewage increase will be negligible. Can they confirm this?

We would encourage the applicant to base any pollution prevention upgrades upon the CIRIA SuDS guidance (SuDS Manual C753). Also, the applicant may need to amend their existing waste acceptance permit.

Should you have any further queries please do not hesitate to contact me.

Yours sincerely

Miss Hannah Brothwell
Sustainable Places Advisor

Direct dial 02084745865
Direct e-mail hannah.brothwell@environment-agency.gov.uk

End

James Neave

From: Carol Hatton <clerk@fordwestsussex-pc.gov.uk>
Sent: 04 February 2020 16:56
To: James Neave
Cc: Trevor Ford
Subject: FW: Reply to west sussex scoping Grundon

Dear James

Please find below the responses to the West Sussex Scoping opinion request. Our chairman Trevor Ford has asked me to forward these to you on behalf of the Parish Council at Ford.
I believe they are self explanatory.

Best Regards
Carol Hatton
Clerk to Ford Parish Council.

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1. Requirement for mandatory best available technology for the incinerator. This should be validated by a technical expert in the field. Requirements would be
    a. Maximum waste to energy efficiency (in other words it should do the best job possible and not be a tick box exercise for WSCC and a profit opportunity for Grundon)
    b. No secondary emissions from the site (this is full control of regulated emissions and demonstration of no increase in secondary emissions). This would be based upon a detailed survey of background levels
2. No storage of ash/clinker on the site where wind and water could lead to contamination of surrounding areas
3. Imposition of the stack on local views to and from the National Park
4. High risk of large visible plume, when weather conditions lead to water vapour condensation, will lead to significant anxiety of local residents in the downwind area
5. No increase in truck movements. All trucks that service the site must be equipped with best available technology emissions control devices, so of Euro VI-C or D standard, to limit emissions under the duty cycles encountered on and immediately around the site.

SCOPING RESPONSE FROM GOODWOOD AERODROME

Re: Ford Energy Recovery Facility - Aerodrome Safeguarding Advice required - JN to Goodwood 29 04 20

Tuesday, 12 May 2020 at 19:22

Good evening Steve. Many thanks for giving me the opportunity to comment on the proposed development at Ford Circular Technology Park.

I have assessed the proposed site against the obstacle limitation surfaces (defined within CAP738) for Chichester Goodwood Aerodrome, and can confirm that the proposed development in terms of height (80m) and scope does not present a flight safety issue for the Aerodrome operation at Goodwood. The proposed site is partially within the safeguarded bird circle (13km) but as we have no approaches to runways in that area, I judge it to be a very low risk of birdstrike.

On behalf of Goodwood Aerodrome, I confirm that there is no objection to the proposed development.

Kind regards,

Mark Gibb
Aviation Operations Manager
Goodwood Aerodrome

On Tuesday, 12 May 2020, 11:05:38 BST, Steve Molnar <steve.molnar@torltd.co.uk> wrote:

Dear Mark,

Further to our conversation, please see below and attached regarding the proposed development at Ford.

As discussed, we would be most grateful if you could respond regarding any issues to be addressed regarding Goodwood Aerodrome.

Kind regards

Steve Molnar BA(Hons) MPhil Dip UP MRTPI
Technical Director

Office 020 3664 6755
Mobile 07770 227980

From: James Neave <James.Neave@westsussex.gov.uk>
Date: Wednesday, 29 April 2020 at 14:49
To: "mark.gibb@goodwood.com" <mark.gibb@goodwood.com>
Cc: Steve Molnar <steve.molnar@torltd.co.uk>, Paul McLaughlin <paul.pgm@outlook.com>, Emma Robinson <emma.robinson@torltd.co.uk>
Subject: Ford Energy Recovery Facility - Aerodrome Safeguarding Advice required - JN to Goodwood 29 04 20

Mark,

I hope you are well?

You may recall WSCC consulted you as part of the EIA scoping exercise but we didn't receive a response (see attached). Following a recent discussion with the applicant regarding their proposed application submission in the near future, the issue of aerodrome safeguarding has been highlighted.

Essentially, the applicant will need to include an aerodrome safeguarding statement as part of their planning application (a validation requirement), and as such seen are keen for your guidance on any issues that need to be addressed or considered in relation to Goodwood Aerodrome.

I would be grateful if you could contact Emma or Steve directly to discuss this (Agents for the applicant and copied to this email). Please also see telephone number for Steve below.

Steve Molnar BA(Hons) MPhil Dip UP MRTPI
Technical Director

Office 020 3664 6755
Mobile 07770 227980

Whilst writing I would be grateful if you could also confirm that the following is still the correct contact details for you?

Mark Gibb – Mark.Gibb@Goodwood.com
Aviation Operations Manager / Head of Goodwood Aero Club
Goodwood, Chichester, West Sussex PO18 0PH
T:01243 755061 | M:07801 868109

Many thanks in advance,

James

James Neave| Principal Planner, Planning Services, West Sussex County Council

Location: Ground Floor Northleigh, County Hall, Chichester, PO19 1RH

Internal: 25571 | External: (+44) 033022 25571| E-mail: james.neave@westsussex.gov.uk

From: Emma Robinson [mailto:emma.robinson@torltd.co.uk]
Sent: 16 March 2020 11:21
To: mark.gibb@goodwood.com
Cc: Steve Molnar; Paul McLaughlin
Subject: Ford Energy Recovery Facility - Environmental Impact Assessment Scoping
Importance: High

Dear Mr Gibb

On the 24th January 2020 Terence O'Rourke Ltd, on behalf of Ford EfW Ltd, wrote to West Sussex County Council (WSCC) and requested an environmental impact assessment (EIA) scoping opinion in relation to proposals to build and operate a conventional energy recovery facility (ERF) to treat non-hazardous, non-recyclable residual waste at the Ford Circular Technology Park at Ford Road, Ford. Alongside the letter, we sent a Scoping Report, please see attached for your reference.

I understand from James Neave, the case officer for the project at WSCC, that he forwarded the Scoping Report to you in case there were any concerns in relation to the operation of Goodwood Aerodrome and any requirement for lighting the proposed stack, which will be approximately 80m high.

The deadline for receipt of the council's formal Scoping Opinion was last Friday, however, as your comments had not been received at that stage, I would be very grateful if you could let me know (either directly or via James Neave) whether there are any issues that you consider we should be taking into account during the preparation of our planning application and EIA.

Please let me know if you require any further information.

I look forward to hearing from you.

Kind regards

Emma

(EIA co-ordinator)

--

Emma Robinson
Associate Director

_____

Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Request for Scoping Opinion under Regulation 1

Proposal: Energy Recovery Facility and Transfer Station

At: Ford Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY

Grundon Waste Management Ltd and Viridor has requested that West Sussex County Council undertake a EIA Scoping Opinion in relation to the above proposal, as set out in the attached request.

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.

The information you provide will be placed on the public record.

I would be grateful for your comments by **17 February 2020** so that I can issue a Scoping Opinion within 5 weeks, as required by legislation. If you are likely to miss this target, please let me know.

Please direct correspondence to the Case Officer, james.neave@westsussex.gov.uk.

Kind regards

James Neave

James Neave| Principal Planner, Planning Services, West Sussex County Council

Location: Ground Floor Northleigh, County Hall, Chichester, PO19 1RH

Internal: 25571 | External: (+44) 033022 25571| E-mail: james.neave@westsussex.gov.uk

Historic England

Mr James Neave
West Sussex County Council
Planning Business Unit, 2nd Floor
Northleigh, County Hall
CHICHESTER
West Sussex
PO19 1RH

Direct Dial: 0207 973 3630

Our ref: PL00675523

17 February 2020

Dear Mr Neave

Ford Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY: REQUEST FOR EIA SCOPING

Thank you for contacting us on 27 January 2020 regarding an EIA scoping opinion in relation to the above site. On the basis of the latest information about the proposals, detailed below, I offer the following advice.

Advice
The proposal is for scoping to inform a decision regarding construction and operation of a conventional energy recovery facility (ERF) to treat non-hazardous, non-recyclable residual waste.

Development on this site has the potential to impact upon both designated and undesignated heritage assets and their settings both within the boundary of the proposed development area and in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development of this area might have upon those elements which contribute to the significance of these assets.

Designated heritage assets
Our initial assessment of the Scoping Report shows that the designated heritage assets within the near vicinity of the proposed development (a 2.5km radius) have been identified (section 2.2), and that undesignated heritage assets and archaeology have been scoped in (section 7).

We note that heritage assessment will be supported as necessary by an analysis of viewpoints to and from key locations, including selected listed buildings, and that the assessment will cross reference with the landscape and visual assessment as appropriate. We think this is a suitable approach to understanding potential impacts on the historic environment.

Analysis of the views from within the site, out of, and across the site in relation to designated heritage assets will be important. As indicated above, we recommend close collaboration of cultural heritage and landscape/visual impact assessment, in order to adequately address issues in relation to setting of heritage assets. Setting may also form a part of the wider conceptual significance of a heritage asset. Further guidance on setting can be found at our website (https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/).

Non-designated heritage assets
We would expect the Environmental Statement to 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. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We note that the area of the proposed development has been identified as having archaeological potential for archaeology relating to multi-period farming and settlement activity, and World War II or early post-war military structures (sections 7.6). Consideration must be given as to whether any undesignated heritage assets have the potential to be of national importance and therefore of equal significance to designated assets.

We would strongly recommend that conservation and archaeological staff at the relevant County and Local Councils are involved at an early stage. They are well placed to advise on: local historic environment issues and priorities; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Further comments
The assessment should also take account of the potential impact which associated development activities (such as construction, servicing, maintenance, and associated traffic) might have upon perceptions, understanding, and appreciation of the heritage assets in the area. The assessment should also consider the likelihood of alterations to drainage and ground water patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

Recommendation
We urge you to address the above issues, and recommend that production of an Environmental Statement should continue in accordance with national and local policy guidance, and following your expert conservation advice. If you have any queries

about any of the above, or would like to discuss anything further, please contact me for further advice.

Yours sincerely,

Rebecca Lambert
Inspector of Ancient Monuments
rebecca.lambert@HistoricEngland.org.uk

Ford Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY: REQUEST FOR EIA SCOPING

List of information on which the above advice is based:

- Request for scoping opinion from James Neave, Principal Planner, West Sussex County Council, dated 27 January 2020

- Environmental Impact Assessment scoping report; Ford Circular Technology Park Ford Energy Recovery Facility and Transfer Station, Ford [produced by Terence O Rourke 2020]

James Neave

From: dan montagnani <[redacted]
Sent: 17 February 2020 23:34
To: James Neave
Cc: environmental.health@arun.gov.uk; planning@arun.gov.uk; Sam Langmead; Roger Davies; Parish Clerk (Lyminster); Tracey Frampton; Jennifer Le Page; Matt Ashman
Subject: Request for EIA Scoping Opinion - Proposed Development at Ford Circular Technology Park - Consultation

James,

Further to our recent exchanges on this matter I am reverting with the following points:

1. Is there sufficient planned assessment for air quality impact? Specifically the stack emissions and long term consequences on residents and agricultural land in particular. I note that this application includes provision for the site to accept waste from outside the county - perhaps this is something that outside of this scoping exercise that WSCC would like to engage with parish councils on at a forthcoming WSCC JEAAC meeting? I would imagine that part 2 of this could be WSCC plans for Community Infrastructure Levy plans for this scheme?

2. Modelling of stack emissions should be predicated on the precise engineering process and design specification for the proposed plant, not theoretical assumptions as is often the case in these types of models. The applicant cannot claim to not have this detail if they are investing in this planning submission. In my brief review of the previous 2013/15 planning application note that the previous planning application granted in 2015 was free from this detail (at least I haven't found it in the few days I have had to review these documents).

3. Carbon balance modelling should incorporate waste journey distances accurately reflecting anticipated waste imports to the site from beyond West Sussex whilst the comparison to alternative waste strategies should not be limited to landfill and reflect realistic future waste disposal options. Both of these variables could be used to drive very different model outcomes.

4. Transport infrastructure - I am not seeing satisfactory consideration of proposed traffic moving between the A259 and the A27 and waste arriving at the site from across and outside the county. It is obviously worth noting that the A27 Arundel bypass scheme is still in consultation stage with Highways England and there is no confirmed connection for the Ford Road to the A27. Further consideration of this is required on the distributed road network to include current traffic flows from the A27 to the A259 including the A284 / Lyminster Road.

5. Safety and accident planning. The Terence O'Rourke scoping considers impacts with regard to COMAH sites but does not consider the consequences or mitigation of disasters or major accidents as a result of the operation of the planned facility.

Just to reiterate, it is disappointing that WSCC has not been more proactive in engaging with adjacent parish councils during this process and we are left with just a few days to review this matter. I hope that moving forward you will ensure that we are fully engaged. I look forward to hearing about the next stages of this process.

Kind regards,

Dan Montagnani
Chairman, Lyminster & Crossbush Parish Council

cc - Arun DC Environmental Health and Planning
cc - Lyminster & Crossbush Parish Councillors and Clerk

James Neave

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 04 February 2020 12:16
To: James Neave
Cc: NATS Safeguarding
Subject: RE: EIA Scoping Opinion - Ford Circular Technology Park - Consultation (SG29300) - JN clarifications to NATS 04 02 20

Dear James

Thanks for providing the requested details below. The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

Date: 13 February 2020
Our ref: 307207
Your ref: Energy Recovery Facility and Transfer Station

James.Neave@westsussex.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Mr Neave

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): EIA Scoping Opinion for Energy Recovery Facility and Transfer Station - Ford Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY **Location:**

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated and received on the 27th January 2020**.**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law[1] and guidance[2] has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission.

Annex A to this letter provides Natural England's further advice on the scope of the Environmental Impact Assessment (EIA) for this development. The EIA scoping report of January 2020 was reviewed together with the Geo-environmental report dated September 2015 and Transport Statement dated 2018.

The EIA Scoping Report suggests that a Natural Heritage chapter is not required as it would simply repeat the Air Quality Assessment which is intended to be undertaken.

Natural England would like to see a Natural Heritage Chapter included within the EIA (whilst acknowledging that this may indeed refer to the results of a full Air Quality Assessment).

Impacts to be considered as part of a Natural Heritage chapter include impacts to the Dundon 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). Impacts to 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. Please see Annex A for further information.

[1] Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)
[2] *Note on Environmental Impact Assessment Directive for Local Planning* Authorities Office of the Deputy Prime Minister (April 2004) available from http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Rose Morgan by email at rosemary.morgan@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Rose Morgan
Adviser
Sussex and Kent

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition paragraph 176 of the National Planning Policy Framework requires that potential Special

Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.
Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)

- Dundon to Bignor Escarpment SSSI and SAC
  Arun Valley SAC and SPA
  Fairmile Bottom SSSI
  Arundel Park SSSI
  Climping Beach SSSI

- Further information on the SSSI and its special interest features can be found at www.magic.gov . The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within Dundon to Bignor Escarpment SSSI and SAC and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

- - European site conservation objectives are available on our internet site http://publications.naturalengland.org.uk/category/6490068894089216

2.3 Regionally and Locally Important Sites
The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

- Fairmile Bottom Local Nature Reserve
- West Beach Local Nature Reserve

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)
The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly

surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

2.5 Habitats and Species of Principal Importance
The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration…in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

Ancient Woodland – The S41 list includes six priority woodland habitats, which will often be ancient woodland, with all ancient semi-natural woodland in the South East falling into one or more of the six types.

Information about ancient woodland can be found in Natural England's standing advice http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland_tcm6-32633.pdf.

Ancient woodland is an irreplaceable resource of great importance for its wildlife, its history and the contribution it makes to our diverse landscapes. Local authorities have a vital role in ensuring its conservation, in particular through the planning system. The ES should have regard to the requirements under the NPPF (Para. 175)2 which states:
When determining planning applications, local planning authorities should apply the following principles:
a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts);

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

2.6 Contacts for Local Records
Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Designated Landscapes and Landscape Character

Nationally Designated Landscapes
As the development site is within/adjacent to the South Downs National Park, consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for the South Downs National Park.

Landscape and visual impacts
Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes
You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm.

4. Access and Recreation
Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Rights of Way, Access land, Coastal access and National Trails
The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

5. Soil and Agricultural Land Quality
Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 of the NPPF. We also recommend that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 170 of the NPPF.

6. Air Quality
Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

7. Climate Change Adaptation
The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

8. Cumulative and in-combination effects
A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an

assessment, (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

James Neave

From: Darryl Hobden
Sent: 10 February 2020 10:52
To: James Neave
Subject: RE: Request for EIA Scoping Opinion - Proposed Development at Ford Circular Technology Park - Consultation

Hi James,

From what I can see the Public Footpath here is not affected as Footpath 200_3 passes a 70m section to the N/E corner of the site (see below). It would be useful to confirm if they foresee any issues and whether a closure during works would be required, which will need a formal application and associated costs well in advance.

The footpath may fall outside of the site boundary but again would be good to clarify.

Let me know if these comments are sufficient for this exercise or if you need something more detailed/formal.

Thanks,

Darryl

Darryl Hobden
Access Ranger – Area 4
Rights of Way - Highways and Transport
West Sussex County Council

Location: 1st floor Northleigh, Tower Street, Chichester, West Sussex, PO19 1RH
Contact: Mob: 07711 035667 |**External:** +44 (0)330 222 4233 **E-mail:** darryl.hobden@westsussex.gov.uk
Main Office: Public Rights of Way 01243 777620 or prow@westsussex.gov.uk

To ensure any new problems with a Public Right of Way (PROW) or a new PROW related enquiry is dealt with as quickly and effectively as possible, please click here to: Report a problem with a Public Right of Way

Landowners please be aware that you are responsible for trees on your land. You have a legal duty of care and must maintain your trees in a reasonably safe condition. For information on ash dieback please click on the following link;

https://www.westsussex.gov.uk/land-waste-and-housing/public-paths-and-the-countryside/ash-dieback/

Darryl Hobden

Public Health England

Environmental Hazards and Emergencies Department
Centre for Radiation, Chemical and Environmental Hazards (CRCE)
3rd Floor, Skipton House,
80 London Road,
London,
SE1 6LH

chemicals.londond@phe.gov.uk

www.gov.uk/phe

Your Ref:
Our Ref: CIRIS 52904

James Neave
Principal Planner, Planning Services,
West Sussex County Council
Ground Floor Northleigh,
County Hall,
Chichester, PO19 1RH

[by email]

13 February 2020

Dear Mr Neave,

Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Request for Scoping Opinion under Regulation 15
Proposal: Energy Recovery Facility and Transfer Station at Ford Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY

Thank you for contacting Public Health England (PHE). It is understood that a scoping opinion is sought on the proposed nature and scope of the information we typically expect to be assessed and considered in an Environmental Impact Assessment (EIA). Advice offered by PHE is impartial and independent.

PHE exists to protect and improve the nation's health and wellbeing and reduce health inequalities; these two organisational aims are reflected in the way we review and respond to consultations, although we note that we are not a statutory consultee for local planning applications.

In this instance, the proposed development comprises an energy recovery facility to treat non-hazardous and non-recyclable residual waste.

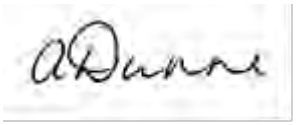
We understand that many issues including air quality, emissions to water, waste, contaminated land etc. will be addressed in specific sections of an EIA but prefer to see public health matters summarised and considered in a specific section of the EIA (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health.

The included appendix outlines generic considerations that we advise are addressed by all applicants when they are preparing Environmental Statements (ES) for the Local Planning Authority. In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. Our view is that the assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal. Where an applicant determines that it is not necessary to undertake detailed assessment(s) (e.g. undertakes

qualitative rather than quantitative assessments), if the rationale for this is fully explained and justified within the application documents, then we consider this to be an acceptable approach. Where impacts relating to health and/or further assessments are scoped out, we would recommend that this is fully explained and justified within submission.

Pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen, are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level. Reducing public exposures of non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Yours sincerely



Environmental Public Health Scientist

CC: Public Health England South East, Surrey and Sussex Health Protection Team

Appendix: PHE recommendations regarding the scoping document

General Information on Public Health England

PHE was established on 1 April 2013 to bring together public health specialists from more than 70 organisations into a single public health service. We are an executive agency of the Department of Health and are a distinct delivery organisation with operational autonomy to advise and support government, local authorities and the National Health Service (NHS) in a professionally independent manner.

We operate from 8 local centres, plus an integrated region and centre for London, and 4 regions (North of England, South of England, Midlands and East of England, and London). We work closely with public health professionals in Wales, Scotland and Northern Ireland, and internationally.[1] We have specialist teams advising on specific issues such as the potential impacts of chemicals, air quality, ionising and non-ionising radiation and other factors which may have an impact on public health, as well as on broader issues such as the wider determinants of health, health improvement and health inequalities.

PHE's recommendations to applicants regarding Environmental Impact Assessments

General approach

It is the role of the applicant to prepare the ES. PHE provides advice relating to EIA within this document and during any relevant consultation stages.

When preparing an ES the applicant should give consideration to best practice guidance such as the Government's Handbook for scoping projects: environmental impact assessment[2] , IEMA Guide to Delivering Quality Developments[3], and Guidance: on Environmental Impact Assessment[4]

The Planning Inspectorate's Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements also provide guidance to applicants and other persons with interest in the EIA process.

It is important that the submitted ES identifies and assesses the potential public health impacts of the activities at, and emissions from, the development.

PHE understands that there may be separate sections of the ES covering the assessment of impacts on air, land, water and so on, but expects an ES to include a specific section summarising potential impacts on population and health. This section should bring together and interpret the information from other assessments as necessary. The health and population impacts section should address the following steps.

1. Screening: Identify and significant effects:
    a. Summarise the methodologies used to identify health impacts, assess significance and sources of information
    b. Evaluate any reference standards used in carrying out the assessment and in evaluating health impacts (e.g., environmental quality standards)
    c. Where the applicant proposes the 'scoping out' of any effects a clear rationale and justification should be provided along with any supporting evidence.

2. Baseline Survey:
    a. Identify information needed and available, Evaluate quality and applicability of available information
    b. Undertake assessment

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[1] https://www.gov.uk/government/organisations/public-health-england/about#priorities
[2] https://www.gov.uk/government/publications/handbook-for-scoping-projects-environmental-impact-assessment
[3] https://www.iema.net/assets/newbuild/documents/Delivering%20Quality%20Development.pdf
[4] https://www.gov.uk/guidance/environmental-impact-assessment#the-purpose-of-environmental-impact-assessment

3. Alternatives:
    a. Identify and evaluate any realistic alternative locations, routes, technology etc.

4. Design and assess possible mitigation
    a. Consider and propose suitable corrective actions should mitigation measures not perform as effectively predicted.

5. Impact Prediction: Quantify and Assess Impacts:
    a. Evaluate and assess the extent of any positive and negative effects of the development. Effects should be assessed in terms of likely health outcomes, including those relating to the wider determinants of health such as socio-economic outcomes, in addition to health outcomes resulting from exposure to environmental hazards. Mental health effects should be included and given equivalent weighting to physical effects.
    b. Clearly identify any omissions, uncertainties and dependencies (e.g., air quality assessments being dependant on the accuracy of traffic predictions)
    c. Evaluate short-term impacts associated with the construction and development phase
    d. Evaluate long-term impacts associated with the operation of the development
    e. Evaluate any impacts associated with decommissioning
    f. Evaluate any potential cumulative impacts as a result of the development, currently approved developments which have yet to be constructed, and proposed developments which do not currently have development consent

6. Monitoring and Audit (not a statutory requirement)
    a. Identify key modelling predictions and mitigation impacts and consider implementing monitoring and audit to assess their accuracy / effectiveness.

Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made, the applicant should fully explain and justify their rationale in the submitted documentation.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, the EIA process should start at the stage of site selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES[5].

Human and environmental receptors

The applicant should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land.

Identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities, as well as other vulnerable population groups such as those who are young, older, with disabilities or long-term conditions, or on low incomes) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

[5] DCLG guidance, 1999 http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf

Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions or activities due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the applicant to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential negative impact on health from emissions (point source, fugitive and traffic-related) and activities. An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The applicant should ensure that there are robust mechanisms in place to respond to any complaints made during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from industrial installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding the assessment of emissions from any type of development in order that the ES provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these should:

- include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- encompass the combined impacts of all pollutants which may be emitted by the development with all pollutants arising from associated development and transport, considered in a single holistic assessment (ie, of overall impacts)
- include Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- consider the construction, operational, and decommissioning phases
- consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- fully account for fugitive emissions
- include appropriate estimates of background levels
    - when assessing the human health risk of a chemical emitted from a facility or operation, background exposure to the chemical from other sources should be taken into account
- identify cumulative and incremental impacts (ie, assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (ie, rail, sea, and air)
- include consideration of local authority, Environment Agency, Natural Resources Wales, Defra national network, and any other local site-specific sources of monitoring data
- compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium. Where available, the most recent UK standards for the appropriate media (ie, air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants
- where UK standards or guideline values are not available, use those recommended by the European Union or World Health Organization:

    - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (eg, a Tolerable Daily Intake or equivalent)
    - This should consider all applicable routes of exposure (eg, include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion)
- when quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants, PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach[1] is used
- identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions. This should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (eg, for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.

PHE's view is that the applicant should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure. Further to assessments of compliance with limit values, for non-threshold pollutants (ie, those that have no threshold below which health effects do not occur) the **benefits** of development options which reduce population exposure should be evaluated.

Additional points specific to emissions to air
When considering baseline conditions (of existing air quality) and the assessment and future monitoring of impacts, these should include:
- consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst-case conditions)
- modelling taking into account local topography, congestion and acceleration
- evaluation of the public health **benefits** of development options which reduce air pollution – even below limit values – as pollutants such as nitrogen dioxide and particulate matter show no threshold below which health effects do not occur

Additional points specific to emissions to water
When considering baseline conditions (of existing water quality) and the assessment and future monitoring of impacts, these should:
- include assessment of potential impacts on human health and not focus solely on ecological impacts
- identify and consider all routes by which emissions may lead to population exposure (e.g., surface watercourses, recreational waters, sewers, geological routes etc.)
- assess the potential off-site effects of emissions to groundwater (eg, on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- include consideration of potential impacts on recreational users (eg, from fishing, canoeing etc.) alongside assessment of potential exposure via drinking water

Land quality

We would expect the applicant to provide details of any hazardous contamination present on site (including ground gas) as part of a site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed[6] and the potential impact on nearby receptors and control and mitigation measures should be outlined.

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The applicant should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).
For wastes arising from the development the ES should assess:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated
- Consider issues associated with waste delivery and acceptance procedures (including delivery of prohibited wastes) and should assess potential off-site impacts and describe their mitigation

Other aspects

Within the ES, PHE would expect to see information about how the applicant would respond to accidents with potential off-site emissions (e.g., flooding or fires, spills, leaks or releases off-site). Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

PHE would expect the applicant to consider the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations: both in terms of their applicability to the development itself, and the development's potential to impact on, or be impacted by, any nearby installations themselves subject to these Regulations.

[6] Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

South Downs
National Park Authority

James Neave
West Sussex County Council

Our Ref: SDNP/20/00373/ADJAUT
Contact Officer: Heather Lealan
Tel. No.: 01730 819363

14th February 2020

Dear Sir/Madam,

Neighbouring Authority Consultation

Proposal: ADJACENT AUTHORITY CONSULTATION from WSCC - Under Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Request for Scoping Opinion under Regulation 15, Energy Recovery Facility and Transfer Station

Address: Ford Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY

Thank you for your correspondence received 27 January 2020, consulting us as a neighbouring authority on the above noted development proposals.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination. The statutory purposes and duty of the National Park are:

- **Purpose 1:** To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- **Purpose 2:** To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- **Duty:** To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

The National Park's comments on the development are as follows:

Given the proximity to the South Downs National Park and the scale of the proposal, and visual impact of the proposal will need to be properly assessed. We recommend this is done early on in the process as visual impact in views from the National Park in particular will need to be mitigated through design. The process and evidence for this should be set out within the Landscape & Visual Impact Assessment, but we would expect to see a specific and bespoke piece of work to consider views from the National Park. The SDNPA would expect to see from the applicant, in accordance with the Guidelines for Landscape and Visual Impact Assessment (2013), the following:

- The baseline study must establish if this site is part of the landscape setting of the National Park, the visual setting, both or none. This is essential to establish prior to the development of the assessment.
- Potential for change to views from the National Park to be qualified or quantified, with evidence, within the first section of the report.
-The site appears to be located within a valley which creates one of a small number of coastal gaps along the length of the Chalk Downs. These gaps of undeveloped coast are not only significant to local coastal

communities but they are the locations at which visitors to the National Park gain a visual link and relationship with the coast and the seascape beyond. The impact of such a large building breaking the skyline in views from the National Park must be assessed.
-The assessment must also include the impact of lighting to the structure, in terms of the impact of views and other perceptual qualities from the National Park and the impact on the National Park's status as an International Dark Sky Reserve, (IDSR).

We would query the submitted scoping report conclusion that there is limited change to ground cover due to given the scale of the building now proposed compared to the existing development on this site. The magnitude of this change should be reassessed, (table 10.2 of the Scoping Report).

Para 10.11 of the Report refers to sources of relevant information that will guide the report. The SDNPA recommend the following should form part of the sources of information used to inform the Baseline evidence and understanding of this site:

- South Downs National Park Integrated Landscape Character Assessment (2011)
- Local Landscape Character Assessment
- Historic Evidence (maps, historic landscape characterisation)
- South Downs National Park Viewshed Characterisation and Analysis (2015)
- South Downs National Park Tranquillity Study (2017)
- A bespoke visual assessment.

Para 10.13 - The visualisations of the viewpoints must include all relevant view points within the National Park to lead the design stage. The use of panoramic images must only be used when they the view is truly a panorama (as opposed to images stitched together). Our expectation is that the Landscape Institute guidelines for photography and LVIA are followed.

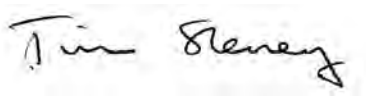
Furthermore, whilst the SDNPA will defer to the relevant statutory and non-statutory consultees to make comment on the air quality assessment details, the SDNPA would like to draw your attention to the sensitive designated areas within the immediate area, including SSSI's and the National Park. The location of the site in relation to the South Downs National Park means that the prevailing wind direction will carry emissions from the development across the National Park. Any such issues of pollution should be fully addressed and mitigated against at assessment stage.

Section 62 of the Environment Act requires all relevant authorities to have regard to the purposes of the National Park, the two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of their areas;
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

At this stage the SDNPA would raise concerns about the scale of the building so close the National Park and the impact of the development on the purposes of the National Park.

Yours faithfully



TIM SLANEY
Director of Planning
South Downs National Park Authority

Contact Officer
Heather Lealan

heather.lealan@southdowns.gov.uk

from Southern Water

Head of Planning Services
West Sussex County Council
The Grange
Tower Street
Chichester
West Sussex
PO19 1RH

Your ref
WSCC/096/13/F

Our ref
PLAN-031624

Date
17/02/2020

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: Proposed development and operation of a waste treatment facility.
Site: WSCC/096/13/F: - New Circular Technology Park (former Ford Blockworks), Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY.

Thank you for your letter dated 27/01/2020.

Further to your scoping document for the above site Southern Water have the following observations to make with respect to the proposed development:

- Due to the size of the development capacity assessments will be required to determine if the existing sewerage system can accommodate the proposed development flows.

- Southern Water requires a formal application for a connection to the public foul and surface water sewer to be made by the applicant or developer.

- Southern Water requires existing access arrangements to Waste Water Treatment Works to be maintained with regards to unhindered 24 hour / 7 days a week access. Southern Water operates a closed gate policy during maintenance works for Health and Safety reasons.

- Trade effluent is any liquid waste (effluent) discharged into our sewers from a business or industrial process. This includes any waste water derived from a production process or from washing down or cooling activities including wastes from public funded activities such as municipal landfills. This can be best described as anything other than domestic sewage (toilet, bath or sink waste) or uncontaminated surface water and roof drainage (rainwater).

Trade Effluent application process for non-household (NHH) customers has changed since April 2017. This was a governmental decision to open the Market to competition.

In order to apply for a consent, you will need to engage a Retailer and submit the application through them. All charges for the trade effluent application and ongoing billing will be through the Retailer Southern Water (SW) is still the owner of assets (Wholesaler), but all administrative or billing matters are conducted by the Retailer of your choice as SW did not enter the Retail market as this point in time.

Attached is a link to the Open Water website that lists Retailers available. Please note that not all Retailers will provide a Trade Effluent service. http://www.open-water.org.uk/for-customers/find-a-retailer/suppliers/english-water-and-wastewater-retailers/

Once we have received an application via your appointed water retailer, we have 2 months to issue a consent or refuse the application. Any permit/consent to the environment e.g. lakes/rivers/streams should be made by the discharger to the EA.

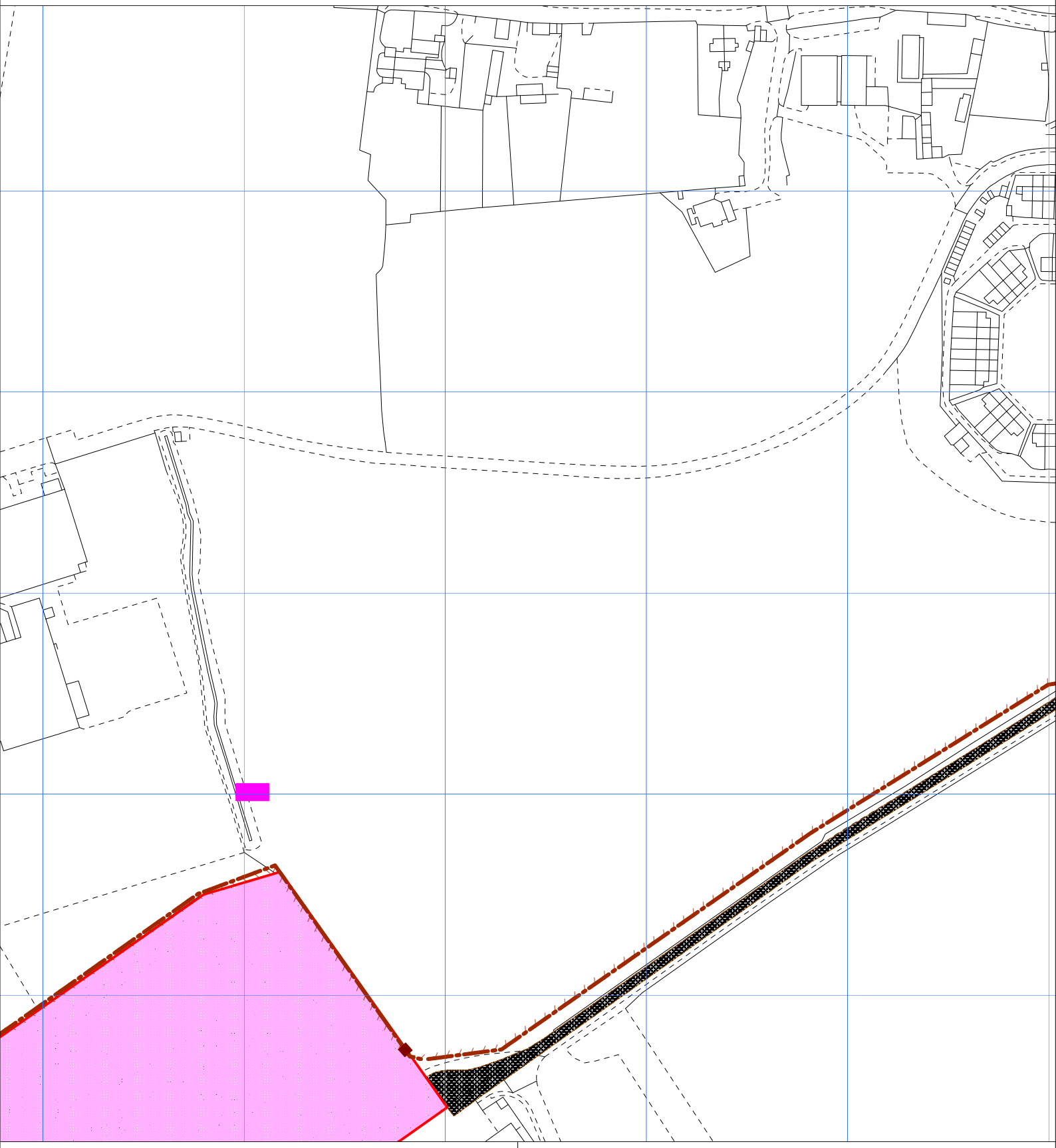
- Southern Water does not supply water to this area.

In case you require any further information, please do not hesitate to contact us via the address shown in the footer of this document.

Yours faithfully,

Joff Edevane
Growth Planning Lead
Business Channels

SOUTHERN WATER

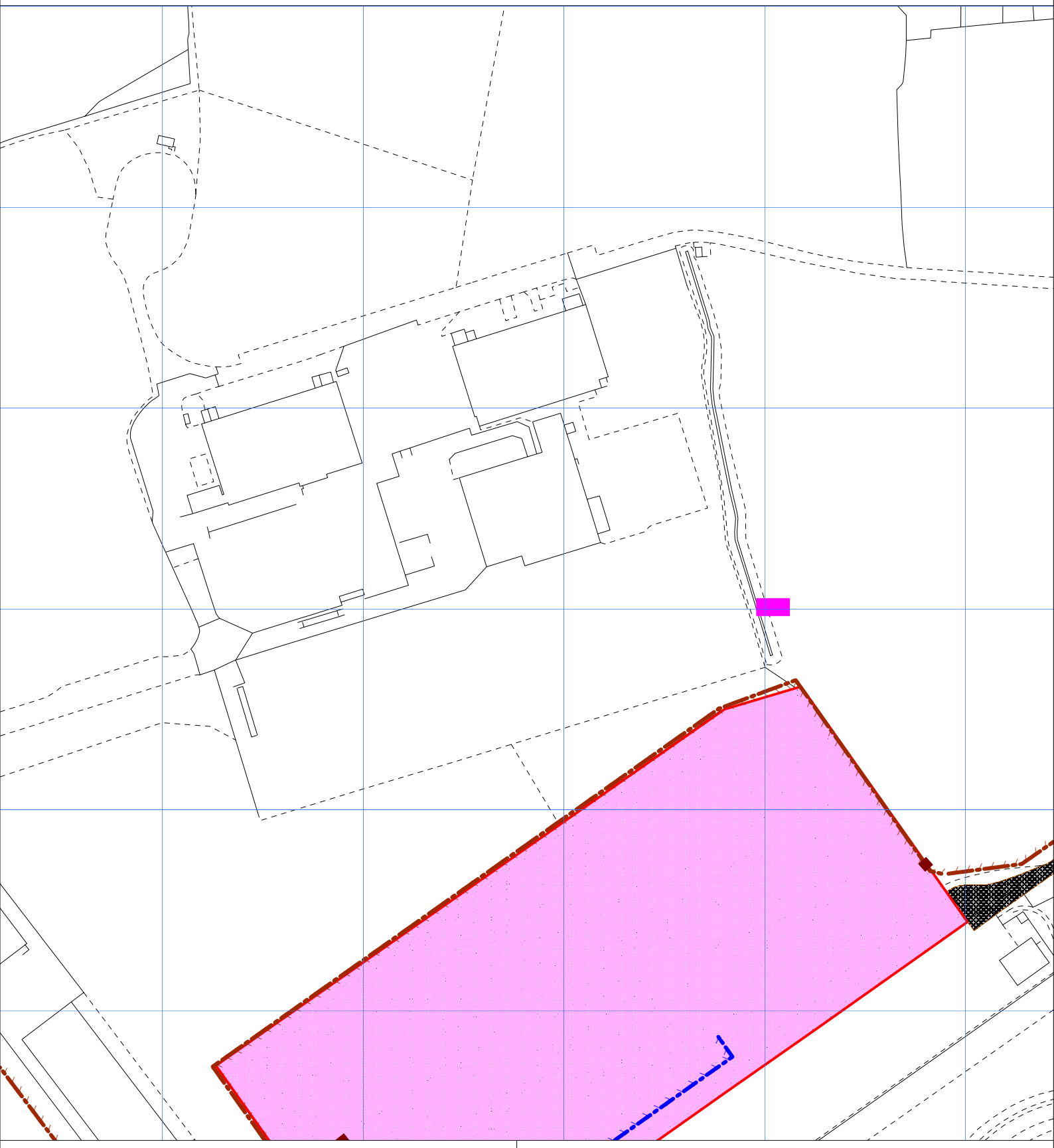


The positions of pipes shown on this plan are believed to be correct, but Southern Water Services Ltd accept no responsibility in the event of inaccuracy. The actual positions should be determined on site.

Southern Water

O.S. REF: SU9903SE	Scale: 1:2500	Printed By: krispad	Date: 17-2-2020
Screen Print		Southern Water MapGuide Browser	
WARNING: BAC pipes are constructed of Bonded Asbestos Cement		Requested By:	
WARNING: Unknown (UNK) materials may include Bonded Asbestos Cement			

SOUTHERN WATER



The positions of pipes shown on this plan are believed to be correct, but Southern Water Services Ltd accept no responsibility in the event of inaccuracy. The actual positions should be determined on site.

Southern Water

O.S. REF: SU9903SW	Scale: 1:2500	Printed By: krispad	Date: 17-2-2020
Screen Print		Southern Water MapGuide Browser	
WARNING: BAC pipes are constructed of Bonded Asbestos Cement		Requested By:	
WARNING: Unknown (UNK) materials may include Bonded Asbestos Cement			

WEST SUSSEX COUNTY COUNCIL – PLANNING SERVICES

Environment & Heritage Team – Response to consultation by County Planning

ARCHAEOLOGY comments

To: - planning.applications@westsussex.gov.uk

FAO: - James Neave, County Planning

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Request for Scoping Opinion under Regulation 15

Date:	10th February 2020
Consultation date:	27th January 2020
Proposal:	Energy Recovery Facility and Transfer Station
At:	Ford Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY
Ref.	F/20b

RECOMMENDATIONS:

- The inclusion of Cultural Heritage (CH) in the EIA is welcomed.
- In the comments below some specific topics are recommended for consideration and attention in the CH chapter in the Environmental Statement (ES). These are:-
  - Inclusion of historical mapping- and aerial photograph-related regression to illustrate the evolution of the pre-airfield and military airfield landscape;
  - Below-ground remains of the Portsmouth to Arundel Canal and its historical alignment;
  - The possibility of survival of 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;
  - Below-ground geoarchaeological deposits within the site (relating to Ice-Age former coastlines and the possibility of contemporary human occupation and associated artefacts);
  - Preparation of a Heritage Visual Impact Assessment (HVIA), including "before and after" photomontages views to and from key designated heritage assets, with "wire diagrams" in the "after" images to show in outline the proposed bulk and height of the new buildings and stack in relation to the heritage assets.

COMMENTS:

The inclusion of Cultural Heritage as part of Environmental Impact Assessment (EIA) is welcomed; section 7.0 (Cultural Heritage) of the Scoping Report has been well thought out.

All the potential cultural heritage effects referred to in Table 7.2 are valid factors to be taken into account in EIA. The Cultural Heritage chapter of the Environmental Statement should include historical map and aerial photograph regression, amongst the sources for which should be photographs of Ford Airfield in West Sussex Record Office.

In respect of "Impact on archaeological remains on site during construction" (Table 7.2), assessed as of low sensitivity, I note that the Geo-Environmental report (Appendix 2) found varying thicknesses of concrete and of made ground beneath.

From the report, there are parts of the site where deep made ground is likely to reflect substantial previous ground disturbance, most probably of wartime or early post-war date. But especially on the west side of the site and parts of the east, depths of 270mm – 400mm of made ground below concrete may not have involved original ground excavations deep enough to reduce or wholly remove buried archaeological features of later prehistoric or Roman date, if present, similar to those recorded in 1999, advance of construction of Ford Wastewater Treatment Works, to the south.

Another significant historical landscape feature which runs below the site, immediately to the south of Hangars 1 and 2, is the early 19th-century Portsmouth to Arundel Canal, where still visible protected in Local Plan development management policy (Arun Local Plan Policy HER DM5).

Development proposals for the surrounding Ford Strategic (development) Allocation (Arun Local Plan: Ford - SD8) must demonstrate compliance with key design and infrastructure requirements including reflection of the historic alignment of the canal (Policy SD8 (h)). Geo-environmental test pits TP12, TP 13, and TP14, from their depths, may well have been excavated through wartime backfill of the Canal.

Consideration of the impact of the proposals on the buried canal, and suitable mitigation measures, should be part of EIA. It is quite possible that the original artificial clay lining of the canal survives below its backfill; development-related excavation (e.g. foundation) works that might breach that lining could have cross-cutting hydrological implications.

Also below the site, at varying depths above the chalk bedrock, are identified river terrace sand deposits (Geo-Environmental Report). It is possible that such deposits may contain early prehistoric artefacts (geoarchaeological deposits) and microfossils which can provide information on the ancient environment of early human occupation. Limited geoarchaeological investigation was carried out in connection with the building of the Wastewater Treatment Works and of the Materials Recycling Facility on Ford Airfield in the late 1990s and early 2000s (West Sussex Historic Environment Record source reports 04_270, 04_276).

In connection with the Cultural Heritage Chapter there should be a desk-based geoarchaeological assessment, carried out by a geoarchaeologist familiar with the Ice-Age Sussex Raised Beach and river terrace sequence.

As regards changes to the settings of scheduled monuments and listed buildings during and post-construction (Table 7.2), the medieval settlement earthworks at Church Farm, Climping, a Scheduled Monument, and Grade I Listed churches of Climping, Ford and Yapton are mentioned specifically in the Scoping Report (7.2, 7.4), all designated heritage assets of the highest significance (National Planning Policy Framework, para. 194 (b)). The upper parts of the existing Hangars 1 and 3 are clearly visible from St Andrew's church, Ford (site visit to church, 28/1/2020).

In connection with the Cultural Heritage chapter of the Environmental Statement there should be a Heritage Visual Impact Assessment (HVIA), with mitigation measures proposed. The HVIA should include before and after photomontages of the digital-image views to and from the nearby Scheduled Monuments, Listed Buildings and Conservation Areas.

Scheduled Tortington Priory and the elevated "heritage ridge line" of Arundel to the north should be included amongst these views, if these fall within the Landscape Zone of Theoretical Visibility (ZTV) ("Heritage ridge line" – including the Keep of Arundel Castle (Scheduled Monument), Grade I Listed Buildings of St Nicholas' church and Arundel Cathedral).

The "after" views should include "wire diagrams" to allow the proposed bulk and height of the new buildings and stack to be appraised in context.

Finally, the "impact on Ford Airfield military structures during construction" (Table 7.2) should take account of previous consideration of the above- and below-ground military structures referred to in the Phase 1 Environmental Site Assessment of September 2012 by Golder Associates (on behalf of Grundon Waste Management), and propose suitable mitigation measures where appropriate.

John Mills
County Archaeologist
Planning Services
West Sussex County Council

John Mills | County Archaeologist, Environment & Heritage Team, Planning Services, West Sussex County Council, Ground Floor, Northleigh, County Hall, Chichester, PO19 1RQ
Telephone: 0330 22 26445 | E-mail: john.mills@westsussex.gov.uk | Web: www.westsussex.gov.uk

02/03/2020
WSCC Ecological Response to…

APPLICATION No.:	**SCOPING**
PROPOSAL:	**FORD ENERGY RECOVERY FACILITY AND TRANSFER STATION, FORD**
SITE:	**FORD CIRCULAR TECHNOLOGY PARK -**

Summary
No objection to the proposed approach

Comment
The majority of the site comprises colonised hardstanding, as well as areas of poor semi-improved grassland, scrub, broadleaved woodland, a non-native hedgerow and scattered trees. The site is judged to be of low ecological value. The proposed development will result in the removal of all three hangars and associated buildings and some areas of hardstanding. Areas of colonised hardstanding, scrub and amenity grassland will also be lost, whilst the broad-leaved woodland will remain intact.

It is proposed that natural heritage is not scoped into the EIA and will not be considered in the ES. However, an ecological appraisal will be submitted in support of the planning application in accordance with local requirements.

Conclusion
Given the limited value of the habitats and species onsite and subject to the usual expectation for mitigation and enhancement being met, in accordance with national and local policy (also refer to s5 of the Ecological Appraisal) , I would not raise an objection to this approach.

Don Baker MCIEEM
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Email: don.baker@westsussex.gov.uk Web: www.westsussex.gov.uk

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Drayton Lane
Drayton
Nr Chichester
West Sussex
PO20 2AJ

James Neave,
Principal Planner,
Planning Services,
West Sussex County Council,
Ground Floor Northleigh, County Hall,
Chichester, PO19 1RH

17 February 2020

EIA Scoping Opinion - Proposed Development at Ford Circular Technology Park

References:

A. Ford EFW Ltd (Grundon Waste Management Ltd and Viridor). Ford Circular Technology Park Ford Energy Recovery Facility and Transfer Station – EIA Scoping Report dated January 2020.
B. Enzygo Geoenvironmental Report: Ford Arundel for Grundon Waste Management Ltd. Dated September 2015.

1. The Lead Local Flood Authority (LLFA) within West Sussex County Council has been approached for comments on the above Scoping Report (Reference A).

2. Paragraph 16.10 of Reference A states: *A flood risk assessment will be submitted in support of the planning application to address flooding and drainage, in accordance with national requirements*. The LLFA requires 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 https://www.westsussex.gov.uk/media/12230/ws_llfa_policy_for_management_of_surface_water.pdf

3. It is noted that the Ground Investigation was undertaken by Enzygo in August 2015 (Reference B).

4. In accordance with LLFA Policy we would expect the applicant to demonstrate 50% betterment in terms of reduction in discharge rates for the proposed brownfield development.

5. It is noted from Reference A that no infiltration drainage is currently proposed. The scope for roof drainage to be directed to infiltration structures should be explored in accordance with the SuDS hierarchy, noting that EA permission would be required because of the presence of the principal aquifer beneath the site (paragraph 16.8). If the EA holds no objection to the

direction of roof drainage to infiltration structures, the LLFA would wish to see evidence of winter groundwater monitoring and soakage tests either to support or discount any decision regarding infiltration.

R C DRABBLE

James Neave

From: Stephen Gee
Sent: 10 March 2020 08:58
To: James Neave
Subject: RE: Request for EIA Scoping Opinion - Proposed Development at Ford Circular Technology Park - Consultation

James,

I note that the application is not intending to scope traffic and transport into the EIA and It is noted that section14.12 and 14.13 that a scoping exercise will take place before producing a transport statement and framework travel plan.

As part of the transport statement scoping exercise the applicant has provided trip generation information that details the site is anticipated to generate an average of 440 two way trips (217 HGV trips and 223 Car and LGV trips) and a peak generation of 462 two way trips (239 HGV and 223 Car and LGV). Network peak hour flows are a maximum of 29 two way trips in the AM peak and 30 in the PM peak.

The EIA submitted as part of the proposed new access road to Ford Circular Technology Park assessed the impact of 334 additional two way trips including 240 two way trips HGV trips. Junction Modelling was provided within the TA for 2024 which detailed the application would not have a severe effect.
It is noted that the application was assessed prior to the Arun Local Plan being adopted. Whilst the Local Plan does include significant planned development in the area such as Ford Airfield, Yapton Strategic Development, Climping and Littlehampton Economic Growth Area, the utilisation of TEMPRO to uplift traffic flows would have accounted for this within the modelling. In addition a significant junction improvement has been secured to the A259 / Church Lane junction as part of the Climping application. Further works are also being developed and funding being secured for the Oystercatcher, Comet Corner and A259/B2187 (Tesco Rbt).

Conclusion
The LPA should consider if traffic and transport should be scoped into the EIA with regard to an updated baseline position reflecting local growth, the baseline position of current HGV flows associated with the site and if the additional predicted 128 daily car and LGV two way trips would require consideration within an EIA.

Regards

Stephen

Stephen Gee | Principal Planner County Highways (Development Management), Planning Services, West Sussex County Council | Location: Ground Floor, Northleigh, County Hall, Chichester, PO19 1RH [redacted]

West Sussex County Council

Landscape Architect Response to Planning Consultation

Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Request for Scoping Opinion under Regulation 15

Date	**17th Feb 2020**
Application Reference	F/20b
Description	Energy Recovery Facility and Transfer Station
Address	Ford Circular Technology Park, Ford Airfield Industrial Estate, Ford, Arundel, BN18 0HY

Comments

1. The application site is located at the Ford Circular Technology Park to the west of Ford and forms part of the former Ford Airfield and lies at approx. 6m AOD. The application site is partially used as an existing waste transfer station and comprises buildings relating to this business and areas of hardstanding and former hangars. Concrete access roads connect the site to Ford Lane in the east and to Ford Airfield Industrial Estate and Rollaston Park in the west. Agricultural land lies to the north, east and west with a sewage works and market site to the south. Further south lies Rudford Industrial Estate, HMP Ford and the village of Climping. The village of Yapton lies to the west. The River Arun lies approx. 1km to the east and the English Channel approx. 2km to the south. A railway line runs east-west approx. 900m to the north of the site before diverging north, south and east to the west of Littlehampton. The wider landscape is generally flat and low-lying before rising up to the South Downs further north.

2. Context/ baseline assessment
    i. Landscape Character;
    The site lies within Chichester to Yapton Coastal Plain landscape character area (LCA) as identified in the West Sussex Landscape Character Assessment. Lower Arun Valley LCA lies immediately to the east of Ford Lane. The boundaries of other LCA lie close by to the south, north and east. Marine Character Area (MCA) 7: Selsey Bill to Seaford Head lies offshore to the south

    ii. Historic Landscape character;
    The site is identified as lying within the Historic Landscape Characterisation Broad Character Type 'Industry' and the Historic Landscape Characterisation Character Type 'Other Industry'

    iii. Designations;
    The South Downs National Park lies approx. 2.3km to the north. There are no designated ecological sites within the immediate vicinity, the closest is Climping Beach SSSI which lies approx. 2.8km to the south. There are a number of heritage assets and conservation areas in the surrounding area, the closest being the Grade II Atherington House and New House Farmhouse and the Grade I Parish Church of St Andrew.

iv. PROW;
Footpath 200-3 runs along the entrance road from Ford Lane and connects with other local PROW, it also forms part of the promoted 'Canal Walks' which follow the course of the former Chichester and Arundel Canal.
The Monarch's Way long-distance footpath lies approx. 4km to the north on higher ground.

v. Common land and OAL;
The closest Registered Common Land/Open Access Land to the site is The Pond at Horsemere Green which is located approx. 1km to the south of the site.

vi. Settlement:
Ford is a small, scattered settlement comprising a group of older buildings centred on the junction of Ford Lane and Station Road close to the Grade I listed church, small developments of post-war houses at Rodney Crescent and Nelson Row, The Ship and Anchor riverside public house and an area of park homes to the east of Ford Station

vii. Tranquillity;
In my opinion the site is generally tranquil with occasional traffic and train noise

viii. Visibility and Views;
Due to the generally flat landform and the scale of the proposed development it is likely that there will be views of the proposed built form where intervening built form and vegetation permits. Elevated views from the South Downs may also be possible and also views inland from the sea.

3. Relevant landscape-related planning policy;

<u>West Sussex Waste Local Plan (April 2014)</u>
Policy W11: Character
Policy W12: High Quality Developments
Policy W13: Protected Landscapes
Policy W14: Biodiversity and Geodiversity
Policy W19: Public Health and Amenity

<u>Arun Local Plan 2011-2031 (July 2018)</u>
Policy LAN DM1: Protection of landscape character
Policy LAN DM2: The Setting of Arundel
Policy D SP1: Design
Policy D DM1: Aspects of form and design quality
Policy HER DM3: Conservation Areas
Policy HER DM5: Remnants of the Portsmouth and Arundel Canal
Policy ENV SP1: Natural Environment
Policy ENV DM5: Development and Biodiversity
Policy W DM3: Sustainable Urban Drainage Systems
Policy QE SP1: Quality of the environment
Policy QE DM1: Noise pollution
Policy QE DM2: Light pollution

Ford Neighbourhood Plan 2017-2031 (January 2019)
Policy EH1: Protection of trees and hedgerows
Policy EH8: Light Pollution
Policy EE10: Quality of Design of commercial buildings

4. Review of EIA Scoping Report by Terence O'Rourke Ltd 2020

Chapter 10.0 of the submitted EIS Scoping Report sets out the applicant's approach to assessing the likely landscape and visual effects. It is noted that the assessment methodology is to follow guidance in Natural England and Defra's 'Landscape and Seascape Character Assessments' (2014) and 'Guidance for Landscape and Visual Impact Assessments 3rd Edition' (2013) produced by the Landscape Institute and Institute of Environmental Management and Assessment. The results of this assessment should then inform the design proposals and provide appropriate landscape mitigation accordingly.

The LIVA should consider:

- Landscape Character Assessments – Referring to all character areas likely to be impacted by the proposals at County, District and local level and referring to character areas within the South Downs National Park (SDNP) and Marine Character Areas (to include but not be limited to: SDNP Integrated Landscape Character Assessment/West Sussex Landscape Character Assessment /WSCC Land Management Guidelines/ Pan Sussex Historic Landscape Characterisation/Seascape Assessment for the South Marine Plan Areas).

Visual effects:

- Due to the scale of the proposed built form and stack a computer-generated Zone of Theoretical Visibility (ZTV) will be essential to determine the receptors that will require consideration and to inform selection of viewpoints (as stated in section 6.18 of the Landscape Institute/IEMA 2013 3rd Edition). Viewpoints should be agreed with WSCC as part of an iterative, collaborative process through which representative views and key views can be identified;
- impact on views should be assessed, including where the proposals may influence, detract from or block views to or from valued landscapes or landmarks including the SDNP;
- impacts on views which are locally valued and/or described in Landscape Character Assessments, Neighbourhood Plans, Village Design Statements, Conservation Area appraisals etc. The SDNPA Viewshed Study ('SDNP: View Characterisation and Analysis' (2015)) should also be referred to;
- potential effects on wider public views should be explored including from the surrounding PROW network and from the higher ground to the north;
- views from nearby residential dwellings (including future residents of the surrounding Arun District Council allocation site) should be considered as should views from transport corridors including road and rail travel, views from public open spaces, playing fields, the market and recreation grounds;
- the study should also take into account impacts on views of the skyline, views of the plume, changes in visual effects due to seasonal leaf cover, impacts of proposed fencing, and buildings taking into account their specific RAL colours and any glare from reflective surfaces and impacts of proposed lighting on dark night skies. If significant lighting is proposed then night-time visualisations will be required.

- Any proposed mitigation (including landscaping and bunding etc) or retention and protection of existing landscape features should be clearly set out and considered in the assessment.

Landscape effects:

- including impacts on designated sites i.e. landscape and visual setting of Conservation Areas, Listed Buildings and other heritage assets, SDNP (including potential effects on the Special Qualities of the National Park), Registered Parks and Gardens;
- impacts on existing vegetation (inc. TPO's or any vegetation to be cleared or retained);
- impacts of any road/access improvements and the potential impact on the character of the surrounding rural lanes e.g. Alterations to access, visibility splays, associated vegetation removal, lighting, signage etc.;
- impacts on tranquillity – including potential noise from internal vehicular movements and machinery;
- impacts on topography, water bodies and site levels and any regrading required as part of the proposals;
- cumulative impacts.

I would recommend that verified photomontages which meet appropriate standards as described in the Landscape Institutes' Technical Guidance Note 06/19 on Visual Representation of Development Proposals are submitted from viewpoints agreed with the local authority showing an accurate visual representation of the proposed development including plumes and, if appropriate, mitigation proposals at year 1 and then at 5 yearly intervals sufficient to demonstrate the effectiveness of the mitigation proposals over time and at full extent

Due to the proximity of the SDNP to the application site the applicant's attention is drawn to the National Planning Policy Framework (NPPF) (particularly with regard to paragraph 172), Defra Circular 2010 - English National Parks and the Broads UK Government Vision, the SDNPA National Park Purposes, National Planning Policy for Waste (NPPW).

The terra firma Consultancy / *Keith Baker* for and on behalf of West Sussex County Council (Environment & Heritage Team)

James Neave

From: Julie Bolton
Sent: 17 February 2020 14:14
To: James Neave
Subject: RE: Request for EIA Scoping Opinion - Proposed Development at Ford Circular Technology Park - Consultation

James,

It is noted that natural heritage is not proposed to be scoped into the EIA.

Given that the currently known baseline concludes that existing habitats have 'negligible value', excluding natural heritage from the EIA may be 'sufficient and appropriate', although the phase 1 habitat survey was undertaken 7 years ago and included in the ES at that time. However, potential construction and post-construction effects have been identified for habitat types and protected / notable species (table 12.1 of scoping report).

It is noted that an ecological appraisal is to be submitted to support the planning application. This should include proposals to comply with anticipated biodiversity net gain requirements. Multi-functional properties of appropriate tree planting would contribute to the mitigation of identified noise and air pollution as well as visual landscape impacts.

Julie